

SECTION 4

RESPONSES TO COMMENTS ON THE RTP PEIR

Letter E-04-0001

Homeowners of Encino

Gerald Silver

Comment received January 16, 2004

1. Comments noted. The 2004 RTP PEIR fulfills the requirements of CEQA and provides a first-tier, regional-scale evaluation of significant environmental impacts. Specifically, the PEIR identifies significant impacts to 1) Land Use; 2) Population, Employment, and Housing; 3) Transportation; 4) Air Quality; 5) Noise; 6) Visual/Aesthetic Resources; 7) Biological Resources; 8) Cultural Resources; 9) Geology; 10) Hazardous Materials; 11) Energy; 12) Water Resources; and 13) Public Services and Utilities. As required by CEQA, the PEIR has been written in a manner that is intended to be "meaningful and useful to decisionmakers and the public" (Public Resources Code § 21003 (b)). As stated in the Draft PEIR, the focus of the environmental analysis in this PEIR is on the potential regional-scale and cumulative impacts of implementation of the Plan. Regional-scale, cumulative impacts are adequately considered for all of the 13 resource categories listed above. The PEIR includes appropriate, generally feasible mitigation measures designed to minimize the significant environmental impacts of implementing the 2004 RTP. Furthermore, the Final PEIR includes a Mitigation Monitoring and Reporting Program (MMRP) designed to ensure that adopted mitigation measures are implemented, monitored, and documented.
2. As specified above, the PEIR is a regional and programmatic evaluation of potential impacts associated with implementation of the 2004 RTP. The analysis in the PEIR presents a comprehensive summary of known geologic and seismic hazards at the regional-scale. Information about known earthquake faults and estimated peak ground acceleration, as well as designated Alquist-Priolo Earthquake Rupture Zones, is depicted in Figure 3.9-3. Areas subject to subsidence have been identified at the regional scale in Figure 3.9-4. Areas subject to liquefaction are presented in Figure 3.9-7. Federally designated flood hazard zones, considering both 100-year and 500-year floodplains, are identified in Figure 3.12-7.

The PEIR is a first-tier, regional-scale analysis, and project-level impacts will be evaluated and mitigated by implementing agencies as specific projects in the Plan are planned, designed, and constructed. Thus, project-level identification of grading, hauling routes, and project-level traffic mitigation will be conducted by implementing agencies as projects in the Plan are developed.

3. The regional-scale, first-tier air quality evaluation for the 2004 RTP PEIR adequately identifies the potential air quality impacts from construction and operation of projects in the 2004 RTP. Specifically, the Air Quality section of the PEIR (Section 3.4) identifies significant air quality impacts from transportation construction and operations, and considers health-risk, secondary, and cumulative air quality impacts under the Plan. Specific changes in air pollutants under the Plan are provided in Tables 3-4.3 through 3-4.19 of the PEIR, and background information is presented in PEIR Appendix 7.3 and in the RTP Transportation Conformity appendix. Table 3.4-2 (page 3.4-14) presents a summary of air quality monitoring data for the whole region, and also depicts the more stringent of the Federal and State standards (threshold levels) for the relevant criteria pollutants. Significant air quality impacts from construction of transportation projects are identified in Impacts 3.4-3 and 3.4-4. Cumulative impacts are addressed on p. 3.4-37.

The Plan includes projects, such as Transportation Control Measures (TCMs), and mitigation measures designed to reduce emissions. On-road mobile source emissions of ROG, NOX, CO, SOX, and TACs are expected to improve compared to current conditions. These improvements are mainly attributed to expected improvements in pollution-abatement technologies. Applicable air quality modeling tools typically employ a reasonable assumption that emission control technology and fuel formulation will improve in the future.

Explicit significance criteria are presented on page 3.4-25 of the PEIR.

At the regional scale it is not feasible to mitigate all of the air quality impacts to a level of insignificance. However, local-level analysis of air quality impacts will be conducted by implementing agencies as projects in the RTP are implemented and project-level mitigation measures will reduce the air quality impacts from construction and operation of individual projects.

Significant health risks are identified for construction and operation of projects in the RTP, and a screening-level health risk assessment is available for review at SCAG's office. Please also see response #5 in comment letter E-04-0019.

The PEIR also considers the long-term impacts of motor vehicle operation through the regional transportation system on sub-populations of individuals, including the elderly, who are particularly susceptible to the adverse health impacts of air pollution, such as from freeways and transportation corridors. A one-quarter mile impact zone was identified around the freeway, transit, and freight rail projects in the RTP, and known schools, hospitals, and nursing homes within this zone were mapped using GIS technology. This analysis is presented in Figure 3.4-2.

Potential impacts to flora and fauna are identified in the Air Quality and the Biology sections (Sections 3.4 and 3.7). Table 3.4-1 in the Air Quality Section identifies that criteria pollutants harm animals and vegetation and Impacts 3.7-3, 3.7-4, 3.7-5, and 3.7-9 identify indirect impacts to flora and fauna, including secondary impacts from smoke and construction equipment. In addition, indirect and long-term impacts are identified throughout the PEIR.

4. Impact 3.12-8 of the Draft PEIR addresses the regional impacts of the projects and policies included in the 2004 RTP on water supply and demand. In determining that a significant cumulative impact would occur, the existing water use, including the effects of existing conservation measures, was considered part of the baseline. The PEIR states that the 2004 RTP's influence on growth would contribute to an increased demand for water supply and its associated infrastructure.

This regional and programmatic discussion of impacts to water supply is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts, including construction-related water supply and demand, will be appropriately identified as projects in the RTP are planned, designed, and as they undergo project-level environmental review.

5. In a regional-scale, Program EIR, evaluation of the use of reclaimed sewage water for project-specific dust control purposes is not required or appropriate. Evaluation of project-level impacts, including construction-related water use, will be appropriately identified as projects in the RTP are planned, designed, and as they undergo project-level environmental review.
6. Impacts 3.7-1 through 3.7-8 of the Draft PEIR address the regional habitat fragmentation, habitat connectivity, direct injury to wildlife, and barriers to animal migration and foraging routes and corridors, among other biological impacts of the 2004 RTP. The document identifies the barrier effects of new roadways as a significant impact (Impact 3.7-2). Mitigation measures are proposed to lessen this impact, however it remains significant.

This regional and programmatic discussion of impacts is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately identified as projects in the RTP are planned, designed, and as they undergo project-level environmental review.

7. The PEIR identifies significant noise impacts from construction and operation of projects in the RTP, including significant impacts to sensitive receptors, local residents, and construction workers and cumulatively considerable impacts to regional ambient noise levels. Table 3.5-5 highlights the noise levels and duration that can occur during construction. Mitigation

measures in Section 3.5 detail ways that implementing agencies will reduce noise impacts. Impact 3.5-3 identifies significant noise impacts to sensitive receptors, which considers adverse emotional and physiological effects to the elderly and ill. Mitigation Measures MM 3.5-2a through MM3.5-2j detail ways that these impacts will be reduced. The mitigation measures in Section 3.5 will greatly reduce the noise impacts associated with the construction and operation of projects in the 2004 RTP, however the noise impacts will remain significant.

8. The RTP PEIR provides a first-tier, regional evaluation of aesthetics and views, which generally considers light and glare impacts and shade and shadow impacts from construction and operation of projects included in the RTP. Specifically, Impact 3.6-3 identifies that construction and operation of the projects in the 2004 RTP would have a significant impact on visual characteristics, including light and glare impacts. Mitigation included in the PEIR would require implementation agencies to develop design guidelines, including lighting criteria, to minimize visual impacts and to help ensure that elements of proposed facilities would be compatible with surrounding areas (Mitigation Measure 3.6-3a). In addition, the analysis for the RTP PEIR evaluated a 150-foot impact zone adjacent to proposed projects, which identifies the area with existing homes and businesses that could potentially be disturbed by implementation of the RTP (Impact 3.2-2). Furthermore, the PEIR programmatically assesses cumulative impacts to aesthetics and views, which considers light and glare impacts and shade and shadow impacts (Impact 3.6-5), and includes mitigation to reduce the cumulatively considerable contribution to adverse visual impacts (Mitigation Measure 3.6-5a).
9. The RTP PEIR provides a first-tier, regional evaluation of population, jobs, and housing, which considers jobs/housing balance, and the distribution, density, and growth of population. Under the Plan, the regional population is forecast to grow by 6.3 million people and the regional employment is projected to grow by 3 million jobs between 2000 and 2030, as shown in Table 3.2-13 (see the revised version of Table 3.2-13 in Section 5 of this document). Without the Plan, the regional population is forecast to grow by 6.3 million people and 2.7 million jobs. The RTP is anticipated to alter the distribution and density of population and to alter the growth rate in parts of the region. Overall, the regional population growth rate is anticipated to remain the same, regardless of whether or not the projects in the RTP are built. The transportation projects proposed in the RTP are anticipated to lead to more jobs in the region compared to not building these transportation projects. Incorporation of SCAG's Compass Growth Visioning Project into the RTP is designed to help achieve a balance between the environment and population growth and to help maintain the quality of life in the region.

The RTP calls for improved jobs/housing balance throughout the region in terms of focusing housing development near job locations through the key land use strategies in the Plan. This is expected to result in a reduction in commuting and a reduction in per capita Vehicle Miles Traveled, Vehicle Hours Traveled, and vehicle delay, compared to the No Project Alternative.

The question as to whether the RTP "conforms" with the Regional Housing Needs Assessment (RHNA) demonstrates a potential misunderstanding of the relationship between the RTP and the RHNA processes. Although the RTP is one data source considered in developing the RHNA, the RTP process proceeds on a completely different track from the RHNA process. The two processes occur at different intervals, and cover different planning periods (i.e., RTP – 25 years, RHNA - 5 years). Moreover, while SCAG develops the RTP, the CA Department of Housing and Community Development oversees the RHNA process and makes the final RHNA determination. Finally, the RTP contains only forecasted growth for subregions and not forecasted growth for individual cities, which is incorporated in the RHNA. Given these differences between the two processes and the separate tracks, there is no legal requirement for the RTP to necessarily "conform" with the RHNA; however, as a matter of planning policy, the RTP should be consistent with the RHNA and vice versa.

The RTP PEIR is a regional planning document and is not intended to provide information in detail sufficient for project-specific analyses. The kinds and types of jobs created as a result of the 2004 RTP and the effects on unemployment on individuals with various job skills are outside of the scope of analysis of this PEIR, but may be considered by implementation agencies in subsequent analysis conducted for individual projects. The cumulative impact of housing needs due to transportation improvements is addressed in cumulative impact 3.2-4.

Mitigation measures that address the balance of jobs and housing are included in the Population, Housing, and Employment section in Mitigation Measures 3.2-1a and 3.2-2a.

10. At the regional scale, the PEIR identifies the potential acres of housing and business-related land uses that could potentially be disturbed by implementation of the RTP. In the PEIR analysis, a 150-foot potential impact zone was identified around the freeway, freight rail, and transit projects in the 2004 RTP. This zone was overlaid onto SCAG's year-2000 aerial photography data to compute the number of acres of housing and business land uses that could potentially be affected by projects in the 2004 RTP. The PEIR identifies Mitigation Measures 3.2-2a through 3.2-2c to reduce impacts of projects on housing and employment. The PEIR identifies the density of the housing impacted (rural, low, and medium to high) and type of business impacted (commercial, extraction, and industrial). The secondary impacts of individual projects on local housing, retail, and business land uses, such as housing units and value of housing units, size and type of business affected, and land prices, will be evaluated in subsequent, site-specific evaluations conducted by implementing agencies.

11. The PEIR is a programmatic, regional-scale document. Impacts to transportation are analyzed on the regional scale. Localized impacts (such as those to particular intersections and freeways) will be appropriately analyzed in subsequent project-level documents. Project-level analyses by implementing agencies will address construction-related local impacts and Mitigation Measure 3.13-1a details potential content of project-level traffic control plans.

The 2004 RTP utilizes a travel demand model to analyze expected future use of the transportation system. The planning horizon year for the 2004 RTP is 2030, and long-term impacts are evaluated for this horizon year, including the expected induced demand as new facilities are opened. Travelers are assumed to take the shortest route, in terms of travel time, available to them. Transportation data, such as the Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT) spent in delay, are provided in the 2004 RTP and Section 3.3 of the PEIR.

Measures intended to reduce VMT and VHT spent in delay are included as part of the 2004 RTP. The transportation projects included in the 2004 RTP are represented graphically in Figures 2.1-2 through 2.1-8 of the Draft PEIR and they are discussed in Chapter 2.0 of the Draft PEIR and in the 2004 RTP.

12. The RTP PEIR provides a regional evaluation of public services and utilities that considers impacts to public safety and emergency services. The comment that police and fire services are currently inadequate is noted. The PEIR identifies a significant cumulative impact to public safety agencies in cumulative impact 3.13-6 and provides Mitigation Measure 3.13-6a as a measure to reduce the cumulative impact to public safety agencies.

The PEIR identifies that there will be a less than significant direct impact to response times for emergency personnel (pages 3.13-14 and 3.13-15). As stated above, the PEIR identifies Mitigation Measure 3.13-6a as a measure to reduce the cumulative impact to public safety providers.

13. The RTP PEIR is a programmatic, regional-scale document. As appropriate, documentation for individual projects will estimate the local fire-flow requirements, identify improvements needed to provide the adequate gallons per minute (GPM) for fire-flow, identify GPM

requirements for the first due Engine Company and the distance of the first-due truck company, identify ingress and egress roads to accommodate fire apparatus, identify off-site and on-site location of fire hydrants and fire lane widths, and identify the location of present fire protection facilities.

To address staffing levels, the PEIR computes an approximate number of new safety and emergency personnel that will need to be hired to maintain the current ratio of these personnel to the general population. This information is provided in cumulative impact 3.13-6, which is identified as significant.

14. The PEIR addresses current police services on pages 3.13-1 and 3.13-2 of the Public Services and Utilities section. The PEIR is not intended to provide information in detail sufficient for project-specific analyses. Crime rates throughout the region are not part of the scope of analysis for this PEIR. SCAG reports these data in its annual State of the Region report. Response times are addressed in cumulative impact 3.13-4. The cumulative need for additional emergency personnel, including police personnel, is addressed in cumulative impact 3.13-6. The current staffing levels protecting different parts of the region is outside of the scope of analysis of this PEIR.

Environmental evaluations conducted for individual projects may address security at transportation facilities for parking areas, elevators, lobbies, and transportation stations and may provide data on auto theft.

15. The RTP PEIR provides a first-tier, regional evaluation of public services and utilities, which considers solid waste issues. Section 3.13, Public Services and Utilities, addresses the capacity and expected closure date of regional landfills. Detailed landfill capacity information is provided in Table 3.13-6. Environmental evaluations conducted for individual projects should estimate how many cubic yards of soil will be trucked to landfills, how much solid waste will be exported, the haul routes and time of day when city streets will be used for hauling soil, and the sites where the solid waste will be exported.
16. The PEIR identifies that energy demand will increase under the Plan, resulting in a significant direct impact (3.11-2) as well as a significant cumulative impact (3.11-3). If energy demand exceeds peak capacity at any time, backup sources could be used, but it is not possible to forecast this. Individual project-specific environmental reviews will identify project-specific energy consumption.
17. The RTP PEIR provides a first-tier, regional evaluation of wastewater treatment facilities. Current flow and capacity flow, in millions of gallons a day, are presented for the major wastewater treatment facilities in each of the SCAG counties in Table 3.12-6. The PEIR identifies the cumulative impact of the RTP on the wastewater treatment facilities in cumulative impact 3.12-7. Environmental evaluations conducted for individual projects will identify impacts on specific wastewater treatment plants, show which sewage lines will need to be upsized, which streets will be affected and for how long a period, and analyze the availability of hydraulic capacity for the flow in sewers for individual projects.

The PEIR addresses the wastewater to be discharged to the sewer system in cumulative impact 3.12-7. The PEIR identifies Mitigation Measures 3.12-7a, 3.12-7b, and 3.12-7c to lessen the cumulative impact to wastewater capacity. The PEIR acknowledges that even with these mitigation measures, the 2004 RTP would make a cumulatively considerable contribution to the significant impact to wastewater treatment facilities.

18. The RTP PEIR provides a first-tier, regional evaluation of aesthetics and views, which considers obstruction of skyline views. Mitigation measures for the five significant impacts identified in section 3.6 Aesthetics and Views provide mitigation for residents living near the

freeway and roadway system that may have their views blocked by structures that will be built through implementation of the 2004 RTP.

Impacts 3.6-1 through 3.6-4 and Cumulative Impact 3.6-5 and their mitigation measures all address how the 2004 RTP will impact the ambiance and habitability of adjacent communities. Additionally, the impact of the 2004 RTP on businesses is addressed in the Population, Households, and Employment section under impact 3.2-2.

The PEIR identifies the density of the housing (rural, low, medium/high) potentially impacted by construction and operation of the projects in the RTP. In the PEIR analysis, a 150-foot potential impact zone was drawn around the freeway, freight rail, and transit projects in the 2004 RTP. This zone was overlaid onto SCAG's year 2000 aerial photography data to compute the number of acres of housing land uses that could potentially be affected by projects in the 2004 RTP on a regional scale. However, it is outside of the scope of the PEIR to estimate whether the housing marketability will go up or down based on the proximity of housing to specific projects in the 2004 RTP. Project-specific reviews conducted by implementing agencies may evaluate project-specific economic effects.

19. Growth-inducing Impacts and Cumulative Impacts are identified in Chapter 5.0 "Long Term Effects" in the Draft PEIR. For each resource section, the direct impacts of the 2004 RTP are identified and the cumulative impacts due to the 2004 RTP's contribution to changes in urbanization patterns are discussed.
20. The impacts of the No Project Alternative are discussed in "Chapter 4.0: Alternatives" of the Draft PEIR. The No Project Alternative does not fulfill the basic objectives of the Plan. A comparison between the 2004 RTP and the No Project Alternative is also provided in each impact category section. Findings regarding the No Project Alternative are included in the "Findings and Statement of Overriding Considerations" required to be adopted by the SCAG Regional Council at the time of certification of the PEIR.
21. Direct mailing to all parties located within one mile of affected freeways would involve a large portion of the population of the SCAG region. The cost of postage to several million people is beyond SCAG's financial resources. Accordingly, SCAG provided public notice via several newspapers and at all county clerks' offices in the region. The Draft PEIR was also made available to the public at eleven libraries in hard copy and at about 100 others via CD-ROM. In addition, over 2000 CD-ROMs were mailed out. The duration of the public review period meets legal requirements and was extended one week beyond the required 45-day period to help foster additional public participation. In addition, the Draft PEIR has been available on the SCAG website since December 19, 2003. Two public hearings were held in the San Fernando Valley in November following release of the draft RTP. Public outreach efforts are limited by time and financial resources and by the vast size of our region. However, SCAG fulfilled the requirements and the spirit of CEQA-mandated public participation, and continuously seeks to expand and improve outreach and participation throughout the region.
22. The "Areas of Known Controversy" section of the Draft PEIR identifies that "potential alignments for capacity enhancement projects" are areas of known controversy. Furthermore, the Draft PEIR includes all of the letters received on the Notice of Preparation, which fully discloses specific areas of controversy raised during the environmental scoping process (Draft PEIR Technical Appendix 7.2).
23. The request to not issue a Statement of Overriding Considerations (SOC) is noted. Although implementation of the adopted mitigation measures included in the PEIR will help reduce adverse environmental effects, implementation of the 2004 RTP is expected to be associated with numerous significant impacts, and, thus, a SOC is required in order to adopt the Plan (CEQA Guidelines Section 15093 (b)).

Letter E-04-0002

Moreno Valley Group of the Sierra Club
George Hague
Comment received January 20, 2004

1. The preferred alternative was selected through a multi-year, collaborative process based on local priorities and explicit performance criteria.

SCAG's mission statement is:

Leadership, vision and progress, which promote economic growth, personal well-being, and livable communities for all Southern Californians.

The Association will accomplish this Mission by:

- *Developing long-range regional plans and strategies that provide for efficient movement of people, goods and information; enhance economic growth and international trade; and improve the environment and quality of life.*
- *Providing quality information services and analysis for the region.*
- *Using an inclusive decision-making process that resolves conflicts and encourages trust.*
- *Creating an educational and work environment that cultivates creativity, initiative, and opportunity*

(<http://www.scag.ca.gov/mission.htm>)

The complete mission statement clarifies that SCAG is a multi-purpose agency. "Improve the environment" is one of the important guiding principles to help Southern California become more livable and sustainable. However, elements of the mission statement are not absolute and specific elements must be balanced to serve the diverse needs of the region. Although the RTP includes projects (such as Transportation Control Measures (TCMs)) and policies (such as urban-form strategies designed to reduce consumption of natural lands) that will improve the environment, implementation of a balanced transportation plan will cause significant, adverse, environmental impacts. In summary, the 2004 RTP will "not improve all aspects of the environment," and "this is possible" because SCAG's mission statement is broad enough to account for the diverse needs of the region.

2. Characterization of the faults in the PEIR is based on the best data currently available at the regional scale, and is specified in the citation below. The Casa Loma Fault <http://www.data.scec.org/fault_index/sanjacin.html#CASA> is associated with the San Jacinto-Imperial fault system identified in Table 3.9-1 (page 3.9-5). The best available seismic data reviewed by SCAG does not depict the Form Road fault mentioned in the letter.
- 3.-4. Impacts 3.12-3 and 3.12-6 of the Draft PEIR address the regional impacts of projects included in the 2004 RTP on flooding hazards, drainage patterns and surface runoff as well as the contribution to cumulative impacts expected by 2030. This regional and programmatic discussion of impacts to water flow is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately disclosed as those projects are planned, designed, and implemented.
5. Please see the response to comment #6 in letter E-04-0001.
6. SCAG is not currently aware of a finalized alignment that would tunnel through Box Springs Mountain. Such a project would require detailed project-level environmental review.
7. The route between Moreno Valley and Interstate 10 is a corridor under study. The alignment of this road has not been decided. Because the road's alignment is still under study, it is infeasible to project whether or not the now separate communities will grow together, and it is a matter of opinion to speculate whether this would be good or bad. However, the urban-form

strategies contained in the RTP as part of SCAG's Compass Growth Visioning project seek to reduce urban sprawl and preserve open space.

8. Figure 3.9-4, Areas Subject to Subsidence, relies on data available at the time of the analysis, derived primarily from mapped locations of oil and natural gas extraction. Hazards due to land subsidence derive from various factors. As the general discussion of land subsidence (page 3.9-7) points out, subsidence can occur due to a variety of factors, such as agricultural or municipal practices that change the organic, morphologic and hydrologic structures of soil, over-drafting of aquifers, mining and excavation, etc. Subsidence can also occur due to seismic activity (page 3.9-12). Taken together, subsidence due to various causes occurs in the specific places within the region, such as the Northern San Jacinto Valley. The PEIR is a first-tier analysis at the regional scale, intended to identify potential and likely areas of concern, which, in turn, would need to be analyzed and quantified in more detail when specific projects are being implemented, and in response to specific site conditions identified by geologic surveys.
9. A potential noise impact zone from road and transit projects in the RTP is shown with sensitive receptors in Figure 3.4-2. This regional and programmatic discussion of noise mitigation measures is appropriate for a regional, first-tier PEIR. Further discussion of project-level mitigation measures and locations will be appropriately identified as those projects are planned, designed, and implemented.
10. Impact 3.7-2 of the Draft PEIR addresses the regional impacts of projects included in the 2004 RTP on habitat fragmentation, habitat connectivity, direct injury to wildlife, and barriers to animal migration and foraging routes and corridors. In particular, the 2004 RTP includes soundwalls installed for the purposes of noise abatement. These types of noise abatement measures are also identified in MM 3.5-2d and MM 3.7-3c. These noise barriers were taken into consideration in the determination that Impact 3.7-2 was a significant impact on biological resources.
11. Impact 3.7-1 states that transportation projects included in the 2004 RTP would displace habitat, some of which is utilized by sensitive species in the SCAG region. The Draft PEIR assesses that at the regional scale, any disruption of natural vegetation has the potential to disrupt sensitive species, including those species listed by the state or federal governments as "threatened" or "endangered." These impacts are disclosed in Impact 3.7-1 which provides the acreage of various vegetation types occurring within 150 feet of a proposed freeway, transit or freight rail project included in the 2004 RTP. The impact discussion states that further impacts would be expected due to arterial, Maglev, goods movement and other projects included in the 2004 RTP. These impacts to habitat, including that of sensitive species, are identified as significant. This regional and programmatic discussion of impacts to sensitive species is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately disclosed as those projects are planned, designed, and implemented.

Mitigation Measures MM 3.7-1a through MM 3.7-1c are proposed to lessen the impact, however the impact remains significant after mitigation.

12. Impact 3.7-6 states that transportation projects included in the 2004 RTP would displace riparian and wetland habitat. The Draft PEIR provides the acreage of various vegetation types, including riparian habitat, occurring within 150 feet of a proposed freeway, transit or freight rail project. Impact 3.7-6 provides the estimated acreage of known wetlands (those identified by the National Wetlands Inventory) occurring within 150 feet of a highway, transit or freight rail project included in the 2004 RTP. The impact discussion states that further impacts would be expected due to arterial, Maglev, goods movement and other projects included in the 2004 RTP, and that effects on smaller wetlands or other wetlands not appearing in the NWI database would further increase the severity of this impact. This impact

to riparian habitat and wetlands is identified as significant. This regional and programmatic discussion of impacts to wetland and riparian areas is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately identified as those projects are planned, designed, and implemented.

Mitigation Measures MM 3.7-6a through MM 3.7-6d are proposed to lessen the impact, however the impact remains significant after mitigation.

13. Please see the response to Comment #11 above.
14. The PEIR identifies a significant impact from particulate matter (PM₁₀) and discusses the adverse effects of PM_{2.5}. Regional scale peak concentrations and exceedances are shown in Table 3.4-2 (page 3.4-14), and county-level PM₁₀ emissions from heavy duty trucks are described in Table 3.4-7 (page 3.4-31), while an air basin-scale assessment of particulate matter is in Tables 3.4-12, 3.4-15, 3.4-16 and 3.4-18 (pages 3.4-39 and 3.4-40). Although the US Environmental Protection Agency (EPA) has not yet finalized area designations for PM_{2.5}, information on PM_{2.5} is included in the draft PEIR in Table 3.4-1 (page 3.4-7) and described on pages 3.4-9 and 3.4-10. Project-specific evaluations for specific areas of the region will be identified as implementing agencies develop projects in the Plan.
15. Sensitive receptors are discussed on pages 3.4-23 and 3.5-27 and shown on a map in the Draft PEIR. Specifically, Figure 3.4-2 identifies sensitive receptors located within a quarter-mile of freeways, transit and freight rail facilities in the 2004 RTP. Numerous mitigation measures included in the Air Quality, Noise, and Population, Housing, and Employment sections of the PEIR would help reduce adverse impacts to sensitive receptors.
16. The 2004 RTP includes measures, such as Transportation Control Measures (TCMs), designed to result in fewer trucks/cars on the road. In addition, Mitigation Measure 3.3-1a recommends further actions to reduce all vehicle and heavy-duty truck travel and delay. These additional measures include car-sharing programs, additional vanpools, additional bicycle programs, and implementation of a universal employee transit pass program. However, these further measures are currently institutionally and financially infeasible because the 2004 RTP is required to be financially constrained.

SCAG will continue to encourage measures that decrease vehicle miles traveled and that decrease delay.

17. Please see the response to comment #16, above. The Federal Clean Air Act (Section 93.101) identifies numerous Transportation Control Measures (TCMs), such as transit and non-motorized modes, designed to reduce air pollution from mobile sources. TCM projects are those projects that are expected to have substantial air quality benefits. The Federal Clean Air Act requires that non-attainment regions give funding and implementation priority to such projects. TCM projects are also discussed in detail, both in the 2003 AQMP/SIP, Appendix IV-C, and in the 2004 RTP Technical Appendix I, Transportation Conformity. In addition, an evaluation of TCM programs can be found in an EPA report titled, Benefits Estimates for Selected TCM Programs, at <http://www.epa.gov/oms/transp/r98002.pdf>, and in a Bay Area report titled, Evaluation of Transportation Control Measures for Federal and State Ozone Plans, at http://www.baaqmd.gov/pln/Plans/ozone/2003/workgroup/TCM_evals.pdf.

TCMs are effectively employed in Southern California and by other entities throughout the county to help move people and goods, while generating less air pollution. Mitigation Measure 3.4-1b discusses TCMs (page 3.4-32).

18. Growth-inducing impacts and cumulative impacts are identified in Chapter 5.0 "Long Term Effects" in the Draft PEIR. For each resource section, the direct impacts of the 2004 RTP are

identified and the cumulative impacts due to the 2004 RTP's contribution to changes in urbanization patterns are discussed.

19. All PEIR technical appendices were included in the Draft 2004 RTP PEIR. Hard copies were made available at 11 regional libraries. The location of these libraries was publicized on the SCAG website. CD-ROM versions of the Draft 2004 RTP PEIR were made available at 100 libraries across the region. The Draft 2004 RTP PEIR was made available on the SCAG website and was mailed to 2,000 stakeholders.

Letter E-04-0004

**County of Santa Barbara
Valentin Alexeeff
Comment received January 16, 2004**

1. SCAG recognizes the growing importance of the transportation options connecting Santa Barbara County and Ventura County. The Ventura County Transportation Commission in December 2003 identified the US-101 corridor as a long-range priority project and SCAG will work with the Commission to incorporate the Commission's recommendations into SCAG's planning efforts.

Letter E-04-0005

**California Department of Transportation, Aeronautics
Division
David Cohen
Comment received January 26, 2004**

1. Comment noted. The comment describes the RTP and PEIR.
2. Regional-scale, cumulative impacts are identified in each resource section of the PEIR and are highlighted in Chapter 5.0 "Long Term Effects" in the Draft PEIR.
3. The analysis of airport-related air emissions (pages 3.4-41 - 3.4-44) stipulates that potential future increases in airport operations will have significant but unavoidable air quality impacts. This analysis includes mitigation measures that should be considered in future regional aviation system planning. The Draft PEIR was circulated to the FAA, CARB, and the airport authorities. It should also be noted that *de minimis* findings are no longer permitted under CEQA.
4. The 2004 RTP considers transit as high priority for enhancing and improving access to the region's airports, and the RTP includes several transit strategies that address the increased demand for public transportation access to the region's airports. These improvements include both light rail and transitway projects, such as the extension of the Green Line to LAX and the implementation of the Crenshaw Corridor transitway. The preferred aviation plan assumes high-speed rail linkages between airports and major activity centers including Union Station. Aviation related high-speed rail ridership is assumed to be approximately 15% of all high speed rail ridership.

Letter E-04-0006

**City of Tustin
Dana Kasdan
Comment received January 29, 2004**

1. Orange County Transportation Authority (OCTA) is responsible for issuing a finding of compliance with OCTA's Congestion Management Program (CMP) for the local jurisdictions in Orange County. OCTA's 2003 CMP is consistent with the 2001 Regional Transportation Plan (RTP) and with the 2002 Regional Transportation Improvement Program (RTIP). The 2001 RTP and the 2002 RTIP are the current federally approved and conforming plan and program for project implementation.
2. OCTA, through its County Transportation Improvement Program (TIP), incorporates the Capital Improvement Program (CIP) projects into the SCAG RTIP and the RTP. SCAG's RTIP implements the early years of the respective RTP. Projects and programs in the front years of the 2004 RTP are based on the 2002 RTIP.
3. SCAG considered existing general plans in the SCAG database to develop the RTP, but, in creating the RTP land use assumptions, SCAG departed from local general plans to a limited degree. It cannot be assumed that local general plans are consistent with RTP land use assumptions beyond 2010. SCAG cannot and will not require cities to amend their general plan. SCAG is committed to working with local governments beyond the adoption of the RTP to identify opportunities for planning and development that achieve a mutual benefit.

Letter E-04-0007

**City of Seal Beach
Patricia Campbell
Comment received January 30, 2004**

1. The comment is noted that impacts are adequately outlined and mitigation measures seem appropriate.
2. The comment regarding the Los Alamitos Joint Forces Training Base is noted. The Los Alamitos Joint Forces Training Base has been added to the list of active duty military facilities in the SCAG region on page 3.1-4 (See Section 5 below).
3. The comment regarding the sensitivity of local residents about taking on increasing population densities and urban infill programs is noted. SCAG will work to implement Mitigation Measures 3.1-3c, 3.1-3d, and 3.2-1a through its Mitigation Monitoring and Reporting Program to address this concern.
4. The comment is noted that under the Plan substantial air quality benefits are expected in 2030.
5. The PEIR discusses impacts to the elderly on page 3.4-23 and presents a potential impact zone within one-quarter mile on each side of RTP freeway projects in Figure 3.4-2. In addition, impact 3.4-2 identifies a significant cancer risk impact from freeway operations and states that "proximity to roadways is an important factor in assessing exposure. Typically, concentrations drop off dramatically (approximately 90%) after the first quarter mile from the roadway" (Draft PEIR p. 3.4-33).

The RTP PEIR provides a first-tier, regional-scale evaluation of environmental effects and subsequent, project-level environmental reviews will be necessary for specific projects in the RTP, including projects along the I-405 corridor. A portion of I-405 in Seal Beach was explored as part of a preliminary health risk assessment conducted for the PEIR. This assessment is available at SCAG's offices. Please see response #5 in comment letter E-04-0019.

6. SCAG concurs with the observations regarding the fiscal and associated conformity implications of the state budget decisions. Accordingly, staff continues to work with local county transportation commissions to convey to the Governor and the state legislators the importance of protecting transportation funds. Indeed, adequate funding levels to implement the projects proposed in the 2004 RTP (both in the short term and the long term) are critical to meeting the mobility needs of the Region as well as complying with conformity requirements.
7. The comment is noted that the commentor supports SCAG's coordination with the California Air Resources Board's efforts to encourage the federal government to achieve emission reductions from aviation sources.
8. The comment is noted that it will take effort to achieve consensus among local jurisdictions on the future land use changes and growth patterns changes put forth in the 2004 RTP.

SCAG is a consensus-building organization and encourages dialogue among its member jurisdictions about the future shape of the region. One way SCAG is doing this is through the Compass Growth Visioning program. The forthcoming Regional Growth Vision will be used to build a consensus in the region to support changes in land use to accommodate future population growth while maintaining the quality of life in the region. SCAG is committed to working with local governments beyond the adoption of the RTP through the Compass



program and other initiatives to identify opportunities for planning and development that achieve a mutual benefit.

9. Table ES-1 in the Draft PEIR is designed to help provide a clear understanding of the relative comparison among the RTP PEIR Alternatives for all of the resource categories, including air quality. In addition, the tables in Chapter 4 provide detailed numeric information. However, the various air quality tables in Section 3.3 and in Chapter 4 include detailed information with various spatial accounting stances that would be difficult to present in one clear and concise table.

Letter E-04-0008

California Department of Fish and Game
William Tippetts
Comment received February 2, 2004

1. The threshold of significance for Impact 3.7-8 is "conflict with *adopted* Natural Community Conservation Plans (NCCPs)" (emphasis added). The Southern Orange County NCCP has not yet been adopted. Any future conflicts will be addressed once the NCCP is adopted. The regional impact to adopted NCCPs is less than significant.
2. The Draft PEIR identifies that significant impacts to wildlife, including wildlife corridors, would occur with implementation of the 2004 RTP (Impacts 3.7-1 through 3.7-9). This regional and programmatic discussion of impacts to biological resources in the SCAG region is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately identified and mitigated as those projects are planned, designed, and implemented.

The recommendation to review "Missing Linkages, Restoring Connectivity to the California Landscape" is noted. The study provides a useful information source to help inform ongoing efforts to mitigate habitat fragmentation.

3. Mitigation Measure 3.7-2c is modified as follows:

MM 3.7-2c: Individual transportation projects shall include analysis of wildlife corridors during project planning. These studies shall be conducted by qualified biologists with the appropriate expertise, as determined by the lead agency, and they shall be conducted using appropriate methodology over an appropriate time period, especially to account for species with large territories, seasonal variation in movement patterns, and rare or uncommon species. Impacts to these corridors shall be avoided and/or minimized and monitoring of wildlife movement and the success of constructed corridors such as undercrossings should continue for at least one year after construction.

4. At the regional, programmatic level, the Draft PEIR determines that the 2004 RTP, which includes transportation system preservation projects, new transportation investments, and many other types of projects, has a significant impact on biological resources due to barriers to animal movement (Impact 3.7-2). This regional and programmatic discussion of impacts is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately disclosed as those projects (transportation system management, new investments, or other projects) are planned, designed, and implemented.

Mitigation Measure 3.7-2b is modified as follows:

MM 3.7-2b: Each transportation project, including expansion and retrofitting of existing transportation structures, shall provide or rehabilitate wildlife crossings/access at locations useful and appropriate for the species of concern, as feasible and appropriate.

Letter E-04-0009

**City of Chino Hills
Jeffrey Collier
Comment received February 4, 20004**

1. Widening of SR-71 between county line and SR-91 is considered in two phases. The first phase which will add one lane in each direction is in the Baseline (No Project Alternative) and second phase which will add one more lane in each direction is in the constrained plan beyond the baseline. Also, the design, engineering and right-of-way work for the SR-71/SR-91 Interchange is included in the Baseline and the construction is included in the constrained plan.
2. The commentor's concern about the potential gap in HOV system on SR-71 is noted. SCAG will work with the RCTC and evaluate and consider closing the HOV gap in the future RTP update.
3. Please see the responses to Comments 1 and 2 above regarding the projects included in the 2004 RTP. Re-evaluation of impacts is not necessary.



Letter E-04-0010

**City of Santa Clarita
Vince Bertoni
Comment received February 2, 2004**

1. The comment that the Santa Clarita Sub Regional Plan will likely identify needed emission reductions affecting the region is noted.
2. The SCAG/Caltrans model is consistent with the Santa Clarita Valley Consolidated Traffic Model. In response to this and other comments, SCAG has adjusted the growth forecast for North Los Angeles County.
3. Air Quality Impact 3.4-3 identifies "potential construction-related traffic impacts due to congestion from lane closures" (page 3.4-35), and clarifies that these impacts will be addressed during the project-level analysis.
4. Impact 3.4-1a identifies a significant impact from PM10, and the PEIR includes discussion of associated health factors such as "increases in asthma attacks," "premature deaths," "cardiovascular disease," and other "acute and chronic health effects," in addition to cancer (PEIR page 3.4-10 and Table 3.4-1).

The preliminary health risk assessment used to support SCAG's regional evaluation employed the Office of Environmental Health Hazard Assessment (OEHHA) procedures, which use cancer risk as a reasonable measure for localized air quality impact. Please see response #5 in comment letter E-04-0019.

5. Cumulative impact 3.4-5 considers all sources of pollution, including trains. Mitigation Measures 3.4-1a and 3.4-1b (pages 3.4-31 and 3.4-32) include State and Federal Source Control Measures proposed by the California Air Resources Board as part of the 2003 South Coast Air Quality Management Plan/State Implementation Plan, and this mitigation calls for coordination with federal and state regulators to further reduce emissions from trains (<http://www.arb.ca.gov/planning/sip/stfed03/stfed03.htm>).
6. The comment is noted that sound comprehensive planning relies upon a balance of reality, technical justification, policy, and recognition of limitations on implementation at the local and regional levels.

Letter E-04-0011

**City of Santa Paula
Thomas Bartlett
Comment received February 5, 2004**

1. The Draft RTP does not contain assumptions on development and projects at the suggested level of specificity. This comment is noted, and will be reflected in future planning efforts beyond the scope of this RTP.
2. An adjustment to the forecasted growth for the Ventura County subregion has been made in response to this comment. This adjustment is minor and does not substantively affect the analysis presented in the PEIR.
3. An adjustment to the forecasted growth for the Ventura County subregion has been made in response to this comment. This adjustment is minor and does not substantively affect the analysis presented in the PEIR.
4. Comment is noted, and minor adjustments in the Draft RTP have been made.
5. The Draft RTP does not contain assumptions on development and projects at the suggested level of specificity. This comment is noted, and will be reflected in future planning efforts beyond the scope of this RTP.
6. SCAG's subregion forecasts are determined by historical trends, share of historical growth, and information obtained from local input process. For detail, process, and methodology, please see the 2004 RTP Technical Appendix A, Growth Forecast.
7. Comment is noted. The proposed final RTP will contain growth forecasted at the sub-region level.

Letter E-04-0012

City of Moreno Valley
Frank West
Comment received February 9, 2004

1. CEQA requires that the EIR discuss feasible measures to avoid or substantially reduce the project's significant environmental effect for each significant impact identified in the EIR (Guidelines 15126.4(a)). Mitigation measures 3.1-1b and 3.1-1f are considered generally feasible and are necessary to include as mitigation measures.

Mitigation measure 3.1-1b includes using the LESA analysis method. The LESA system requires agencies to quantify and evaluate the effect of their activities on farmland. As a result of this analysis, cities and counties *may* assess conservation easements or the payments of in-lieu fees as a way to protect farmland. CEQA encourages agencies to use the LESA method as a way to mitigate impacts to agricultural land and preserve agricultural land, and this programmatic-level mitigation measure provides enough flexibility to meet the diverse needs of various projects in the RTP.

Mitigation measure 3.1-1f, which encourages enrollments of agricultural lands for counties that have Williamson Act programs, is a generally feasible way to protect farmland, and MM 3.1-1f includes flexible language, such as "encourage" and "where applicable."

The California Department of Conservation describes the Williamson Act as follows:

The California Land Conservation Act of 1965--commonly referred to as the Williamson Act--enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments, which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971. (California Department of Conservation, Division of Land Resource Protection. (2004, February 8). Williamson Act Program. Retrieved February 11, 2004, from <http://www.consrv.ca.gov/DLRP/lca/>)

2. The Draft PEIR includes the following Threshold of Significance on page 3.3-21: "The proposed Plan would have a significant impact if implementation would potentially generate substantially more total daily Vehicle Miles of Travel (VMT) than the current daily VMT." This threshold of significance is adapted from the checklist of potentially significant environmental effects included in Appendix G of the CEQA Guidelines. The checklist identifies a potentially significant impact to occur if the project would "cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)." At the regional scale, measurement of the increase in VMT provides a reasonable measure to estimate "the increase in traffic in relation to the existing traffic load." Furthermore, increased VMT is expected to be associated with increased mobile source emissions and other adverse effects on the physical environment.
3. Mitigation Measure 3.5-2j is revised as follows:

Page 3.5-26, Paragraph 5:

MM 3.5-2j: Passenger stations, maintenance facilities, decentralized maintenance facilities and electric substations should be located away from sensitive receptors, unless this mitigation would impede implementation of architecturally acceptable Transit Oriented Development (TOD) and appropriate infill development.

4. The RTP PEIR provides a first-tier, regional evaluation of impacts on aesthetics and views, which considers impacts to State Scenic Highways. The stated intent (Streets and Highways Code Section 260) of the California Scenic Highway Program is to protect and enhance California's natural scenic beauty and to protect the social and economic values provided by the State's scenic resources. Mitigation Measure 3.6-2a encourages implementation agencies to *consider* other routes for transportation construction or expansion in order to preserve the scenic beauty of the designated State Scenic Highway. This mitigation measure encourages consideration of alternative routes that avoid scenic highways, but it does not require adoption of infeasible or impractical alignments.
5. The PEIR for the 2004 RTP is a regional-scale, programmatic document. Further discussion of project-level impacts will be appropriately identified as those projects are planned, designed, and implemented. The first paragraph on page 3.7-21 reads, "All mitigation measures shall be included in project-level analysis as appropriate." Implementing agencies for the transportation projects included as part of the Western Riverside Multi-Species Habitat Conservation Plan (WRMSHCP) will determine which mitigation measures are appropriate for specific projects. The WRMSHCP is identified in Table 3.7-6 on page 3.7-16 of the Draft PEIR for the 2004 RTP.

However, for clarity, Mitigation Measures 3.7-1b, 3.7-1c, and 3.7-6d are modified as follows:

Page 3.7-23, Paragraphs 3-4:

MM 3.7-1.b: When avoidance of native vegetation removal is not possible, each transportation project shall replant disturbed areas with commensurate native vegetation of high habitat value adjacent to the project (i.e. as opposed to ornamental vegetation with relatively less habitat value), as appropriate based on the site conditions, and other considerations of the lead agency and appropriate resource agencies.

MM 3.7-1c: Individual transportation projects shall include offsite habitat enhancement or restoration to compensate for unavoidable habitat losses from the project site as appropriate based on the site conditions, and other considerations of the lead agency and appropriate resource agencies.

Page 3.7-30, Paragraph 2:

MM 3.7-6d: When individual projects include unavoidable losses of riparian or aquatic habitat, adjacent or nearby riparian or aquatic habitat shall be enhanced (e.g. through removal of non-native invasive wetland species and replacement with more ecologically valuable native species) as appropriate based on the site conditions, and other considerations of the lead agency and appropriate resource agencies.

6. Please see the response to comment #5, above.
7. Mitigation measure 3.13-7a does not supersede the Leroy F. Green School Facilities Act of 1998 but instead adds a complementary mitigation measure to the Act. The Act does not necessarily provide all of the funding needed to build new schools. Other mitigation measures, such as 3.13-7a, are needed to mitigate this significant impact.

Letter E-04-0014

Metropolitan Water District
Laura Simonek
Comment received February 9, 2004

1. SCAG recognizes that the Metropolitan Water District of Southern California ("MWD"), in conjunction with its member agencies, is in the process of implementing the Integrated Resources Plan ("IRP") to ensure long-term water supply reliability within its service area. SCAG further recognizes that in its Report on Metropolitan Water Supplies issued in March 2003, MWD concluded that the agency had sufficient reliable water supplies to meet water demand in its service area through the year 2025. Although the Draft PEIR recognizes that the water agencies are currently planning to accommodate the growth forecasted in the RTP, CEQA requires the future need to be compared against the existing supply. As such, the PEIR concludes that the 2004 RTP (through transportation projects and other investments) would contribute to a future growth distribution that would exceed the existing available water supplies and water supply infrastructure in the SCAG region. The cumulative impact (Impact 3.12-8) on water supply and water supply infrastructure is identified due to the need to obtain additional supplies and to build additional water supply infrastructure beyond what exists in the baseline (current) condition.
2. The PEIR does not assume that the growth is "necessarily beneficial, detrimental, or of little significance to the environment," and the PEIR does not suggest that growth in and of itself should be characterized as a significant detrimental effect. Instead, the PEIR appropriately concludes that the growth distribution associated with implementation of the RTP will have a significant impact on the physical environment.

Napa Citizens for Honest Government v. Napa County Bds. Of Supervisors (2001) 91 Cal.App.4th 342 is inapposite. Unlike the growth impacts of the RTP, the growth impact resulting from the specific plan at issue in Napa County would occur outside the project area. The RTP, however, provides the infrastructure to accommodate and influence growth within the region.

The significance criterion used in the PEIR for growth-inducing impacts is appropriate under CEQA. Appendix G of the CEQA Guidelines includes growth-inducing impacts as a "potentially significant impact." Specifically, Appendix G questions whether a project would "induce substantial population growth in an area, either directly...or indirectly (for example, through the extension of roads or other infrastructure)." Appendix G provides useful guidance for drafting adequate significance criteria, and, thus, the RTP PEIR threshold of "induce substantial growth to areas of the region" is appropriate and reasonable at the regional scale (page 3.2-10).

The PEIR identifies that implementation of the projects and policies in the 2004 RTP is expected to help facilitate growth to 500,000-700,000 acres of natural, vacant land (PEIR p. 3.2-15). This substantial growth would cause significant impacts to the physical environment. Thus, the growth-inducing impact and associated indirect impacts on the environment will be significant, and it is appropriate to identify the infrastructure needs and other physical impacts of this growth in a first-tier, programmatic PEIR in order to fulfill CEQA's requirements and spirit of full disclosure of environmental effects.

CEQA requires that the PEIR discuss feasible measures to avoid or substantially reduce the project's significant environmental effect for each significant impact identified in the PEIR (Guidelines 15126.4(a)). The proposed mitigation measure for Impact 3.2-1 must remain part of the PEIR.

3. The indirect impact of the RTP on population, households, and employment induces growth into currently vacant parts of the region. The PEIR includes this impact in both the Land Use

section and the Population, Household, and Employment section to clarify that the impact affects both of these criteria under CEQA. The RTP will considerably contribute to regional urbanization, including facilitating growth to vacant areas of the region. A key indirect impact on the physical environment from this urbanization is the consumption of vacant land, and including this cumulative impact in the Population, Household, and Employment section emphasizes the integral relationship between growth and land consumption.

4. The first paragraph on page 3.12-3 has been changed as follows:

"Recent efforts to store recycled water and surplus water in groundwater basins for use during drought periods have proven successful. The Metropolitan Water District of Southern California (MWD) has entered into 22 agreements with various water agencies for groundwater ~~storage~~ recovery, resulting in more than 80,000 af of added supply per year. A number of agencies within the region are also active in the recharge of surface water, including the Orange County Water District, Los Angeles County Department of Water and Power, Foothill Municipal Water District, San Bernardino County Water and Flood Control District, Coachella Valley Water District, the Water Replenishment District of Southern California, the San Gabriel Valley Municipal Water District, and the Calleguas Municipal Water District."

5. Please see the response to comment #4 above.

6. Comment noted.

7. The second paragraph on page 3.12-5 is changed as follows:

"The State Water Project (SWP) supplies water to Southern California via the California Aqueduct, with delivery points in Los Angeles, San Bernardino, and Riverside counties. SWP has historically provided 25 to 50 percent of MWD's water.¹ Southern California MWD's maximum SWP contractual entitlement is about 2.0 maf per year, and the reliable yield is much less. Other SWP water contractors in the SCAG region have a total entitlement of 0.5 maf per year, bringing the region's SWP contractual entitlement to 2.5 maf per year. The reliable yield fluctuates during wet and dry years, and is typically less than the maximum entitlement."

8. The fourth paragraph on page 3.12-8 is modified as follows:

"Since 1995 State and Federal agencies with regulatory or management responsibility in the Bay-Delta have been working together as CALFED to develop a long-term comprehensive plan that will improve water management of the Bay-Delta system and better meet competing goals. The Draft Environmental Impact Report for management alternatives of the Bay-Delta was completed in 1999, and the CALFED program was approved in 2000. Thus, the CALFED program is in the early stages of implementation."

9. The fifth paragraph on page 3.12-8 is modified as follows:

"Much of the urbanized areas of Los Angeles and Orange Counties are serviced by three large publicly owned treatment works (POTWs): the City of Los Angeles Bureau of Sanitation Hyperion Treatment Plant Facility, the Joint Water Pollution Control Plant Outfall System of the Los Angeles County Sanitation Districts, and the Orange County Sanitation District treatment plant. These three facilities handle more than 70 percent of

¹ Metropolitan Water District. (2003). Appendix C: California aqueduct deliveries. In Report on Metropolitan's Water Supplies. Los Angeles, CA.

the wastewater generated in the entire SCAG region, serving a population of approximately 12 million people.”

10. The third paragraph on page 3.12-11 has been modified as follows:

“Water ~~reclamation and recycling~~ involves the treatment of ~~polluted groundwater and~~ wastewater effluent for reuse. ~~New~~ Beneficial purposes include landscape irrigation, surface water amenities in public parks and places, industrial process water, and groundwater recharge. The use of recycled water and recovered groundwater for these various purposes augments the region’s water supplies and reduces the demand for imported water imports.”



Letter E-04-0015

**City of Irvine
Richard Sandzimier
Comment received February 9, 2004**

1. The subregion's growth forecast numbers have been adjusted to reflect this comment. SCAG is maintaining consistency with the growth projections through continued discussions with the Orange County Council of Governments, the Orange County Transportation Authority, and the Center for Demographic Research at California State University Fullerton. At the regional scale, this adjustment is minor and does not substantively affect the analysis presented in the PEIR.
2. Several of the projects mentioned are already part of the RTP. The remaining candidate projects should be coordinated through the Orange County Transportation Authority (OCTA) for submittal for a future RTP update.



Letter E-04-0016

Legal Aid Foundation
Malcolm Carson
Comment received February 9, 2004

1. The PEIR identifies significant cancer risk impacts and significant impacts from PM10 emissions and airport emissions. The PEIR includes mitigation measures designed to reduce the adverse effects, and environmental mitigation has been fully incorporated into the RTP, as required by CEQA (Public Resources Code §21081.6). Specifically, the RTP includes Transportation Control Measures (TCMs) designed to reduce transportation emissions and includes urban form strategies designed to help further reduce VMT and associated emissions.

Transit is a key component of the 2004 RTP, and SCAG remains committed to supporting efforts that increase transit ridership and all of the associated social, economic, and environmental benefits.

SCAG is actively working with city, county, and subregional governments and agencies to devise innovative ways in which local planning practices can be changed to mitigate the environmental and social adverse impacts of economic development, such as through SCAG's growth visioning process, Southern California Compass
<<http://www.socalcompass.org/>>.

2. The RTP PEIR provides a first-tier, regional evaluation of impacts on housing. In the PEIR analysis, a 150-foot potential impact zone was drawn around the freeway, freight rail, and transit projects in the 2004 RTP. This zone was overlaid onto SCAG's year 2000 aerial photography data to compute the number of acres of housing and business land uses that could potentially be affected by projects in the 2004 RTP. Many of the projects identified in the Draft 2004 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components. Because this is a programmatic, regional scale analysis, it is infeasible to estimate the gentrification pressures likely as result of the RTP or the losses of low income housing stock.

The PEIR identifies Mitigation Measures 3.2-2a, 3.2-2b, and 3.2-2c to help reduce the potential loss of land currently used for housing. The PEIR also identifies Mitigation Measure 3.2-4a as a way to engage the region about growth. SCAG does not have the authority to commit the region to a one-to-one replacement housing policy for transportation infrastructure projects. However, SCAG is engaging the region through its Compass Growth Visioning program, which will extend beyond the adoption of the RTP, in an effort to come to a consensus on a vision for the future of the region. Part of that vision will address housing issues. The Compass Growth Visioning program will help chart the course for future development in the region and will help maintain the quality of life in the region.

3. In total, the PEIR identifies 54 significant impacts and provides over 170 generally feasible mitigation measures, including numerous significant impacts and mitigation measures for air quality and housing/communities. Mitigation measures are included in the Mitigation Monitoring and Reporting Program (MMRP), which will help ensure that adopted mitigation is implemented. In addition, Air Quality mitigation has been incorporated into the RTP, as required by CEQA (Public Resources Code §21081.6). In summary, the 2004 PEIR fulfills all of the applicable requirements of CEQA, provides a comprehensive first-tier environmental evaluation of the 2004 RTP, and includes a robust mitigation program to help minimize environmental impacts.

Please see responses to #1 and #2 above for discussion of Air Quality and Housing.



Environmental Justice is addressed in Chapter 5 of the RTP and in Technical Appendix G of the RTP.

Letter E-04-0017

**John Wayne Airport
Alan Murphy
Comment received February 9, 2004**

1. Paragraph 3 on page 3.3-17 of the Draft PEIR is modified as follows:

John Wayne Airport

John Wayne Airport (SNA) is located in the western portion of Orange County, directly south of Interstate 405, one mile east of State Route 55, and one mile north of State Route 73, as shown in Figure 3.3-4 in the map section at the end of this document. Major access routes include these freeways and the major surface streets in the surrounding area, including MacArthur Boulevard and Campus Drive. The majority of the land surrounding the Airport is within the Cities of Newport Beach, Costa Mesa, and Irvine. In addition, the unincorporated community of Santa Ana Heights is located southeast of the Airport.



Letter E-04-0018

**City of El Segundo/Urban Dimensions
Dennis Zane
Comment received February 9, 2004**

1. Both the impacts of September 11 and the recent economic downturn were accounted for in the aviation forecasts in the Draft 2004 RTP, through revisions and recalibrations to the RADAM model. See page D-6-30 in the aviation technical appendices in the Draft 2004 RTP.
2. SCAG's preferred aviation plan is designed to limit growth at urban airports in built-out environments to their existing physical or legal capacities. Airports in North Los Angeles County and the Inland Empire are assumed to be unconstrained.

County aviation demand has been added to the RTP Aviation Appendix (Appendix D-6).

SCAG does not have jurisdiction over how many passengers use each airport or over the decision to construct new airports. As such, SCAG is not required to "identify [or] analyze appropriate and effective measures to mitigate the negative impacts imposed on other communities in the region by counties that fail to accommodate their own aviation demand." SCAG plans the ground access transportation infrastructure needed to serve forecast regional aviation system demand. The forecast is developed in a public process with the input of airport operators, airlines, local elected officials, and technical experts. The resulting preferred aviation plan assumes the airports in urbanized environments (LAX, Burbank, Long Beach, John Wayne, and Ontario) to be constrained to their existing legal or physical capacity. Other airports in North Los Angeles County and in the Inland Empire are assumed to be unconstrained.

SCAG's environmental justice analysis is included in the RTP and the RTP Technical Appendix G.

3. The 78 MAP forecast at LAX is consistent with the recently proposed LAX Master Plan Preferred Alternative "D", which proposes to limit the facility to 78 MAP through gate capacity constraints. The Los Angeles World Airports has stated its support of implementation of the Regional Aviation Plan, and its commitment to work with SCAG in the implementation process.
4. Estimated airport capital costs associated with implementing the Regional Aviation Plan are listed on pg. D-6-24 in the aviation technical appendices in the 2004 RTP. This work will be refined over the next year in the development of a Regional Aviation Implementation Plan.
5. The California Nevada Super Speed Train Commission's Maglev proposal is included as a study in the RTP (see Exhibit 4.9 in the RTP). However, SCAG does not include this project as a construction project due to financial constraint standards set for the transportation plan by federal regulations.

Letter E-04-0019

**South Coast Air Quality Management District
Steve Smith
Comment received February 9, 2004**

1. Background support data for the emissions analysis is presented in the PEIR and in the 2004 RTP Conformity Report (RTP Technical Appendix E).
2. Reductions in emissions depicted in Table 3.4-3, which compares current conditions and the 2030 Plan, capture anticipated future changes from roadway factors, including improved fuel efficiency, enhanced emissions control technology, anticipated fleet turnover, and the cumulative effect of existing rules with future effective compliance dates. These factors are all, collectively, an important influence on projected on-road mobile source emissions in the year 2030. The analysis conducted for the PEIR employs reasonable emission factors and uses current conditions as the baseline for determining significance, as required by CEQA.

Application of the year 2030 EMFAC 2002 factors to the baseline year 2000 VMT is inappropriate because the evaluation would ignore anticipated future changes from all factors, including those from improved fuel efficiency, enhanced emissions control technology, anticipated fleet turnover, and the cumulative effect of existing rules with future effective compliance dates.

Table 3.4-5 reflects a direct comparison between the 2030 No Project and 2030 Plan and provides a useful indicator of the effect of the 2004 RTP. This comparison employs the same year 2030 EMFAC 2002 factors for the 2004 RTP and the No Project Alternative, and, thus reveals the expected emission effects of RTP implementation versus no plan.

Tables 3.4-3 to 3.4-5 are amended to clarify that they depict emissions from on-road mobile sources only.

3. Cumulative impact 3.4-5 considers all sources of pollution, including railroad and marine vessels. The emission budgets for the South Coast Air Basin (SCAB) used in the 2004 RTP analysis are based on the 2003 South Coast Air Quality Management Plan (AQMP). The AQMP considers all sources of air pollution--both mobile (on-road and off-road) and stationary sources (area and point)--in establishing the emission budgets for the SCAB. The use of these emission budgets in the cumulative analysis thus takes account of marine vessels as well as railways.

Marine vessels and railroad sources are federally regulated. As such, they are not under SCAG's jurisdiction, and, thus, it is not required or appropriate to evaluate their direct environmental effects. In contrast, SCAG directly evaluated the potential environmental impact of implementing the Regional Aviation Plan because SCAG is required to prepare and update a regional aviation plan in support of the California Aviation System Plan. The RTP is required to consider "aviation activity" (PUC 21702 (c)) and to include an Airport Ground Access Plan for airports in the region (Government Code 65081.1). In addition, SCAG has a long and well-established history of serving as the regional aviation planning agency for the Federal Aviation Administration (FAA). Given the complexity of air space and jurisdictional issues affecting the diverse array of airports situated in Southern California, the FAA recognizes a special need for regional scale planning, which SCAG has successfully fulfilled. In summary, SCAG's history and authority, although limited, in regional aviation planning, make it appropriate for SCAG to more robustly evaluate the environmental effects of aviation compared to other federal sources, such as marine and rail facilities.

4. The PEIR evaluates a reasonable range of alternatives to the Plan (See Table ES-1 and Chapter 4 of the PEIR).



5. The health risk assessment cited in Section 3.4 of the PEIR is available for review at SCAG's offices. It is important to note that numerous simplifying assumptions were employed and considerable uncertainty surrounds this initial, exploratory evaluation, which is a reasonable source of general information to support SCAG's regional-scale evaluation. On the basis of this initial investigation, SCAG concluded that the health risks are likely to be significant, as the PEIR identifies in Impact 3.4-2 (page 3.4-33). Detailed, project-specific environmental analysis will be conducted by implementing agencies as projects in the Plan are finalized and implemented.
6. As stated above, SCAG does not have direct jurisdiction over federal sources, and, thus adoption of the 2004 RTP PEIR is not expected to have a direct effect on emissions from railroads and marine vessels.
7. The mitigation measures for Plan-related construction activity stipulate compliance with SCAQMD's Rule 403, with regard to the requirements for high wind conditions, dust control actions, and track-out control actions.

In the case of off-road diesel exhaust-related mitigations, the use of "low sulfur or other alternative fuels" is stipulated in MM 3.4-3i.

The following mitigation measures suggested by the commentor are added (see Section 5):

- Encourage the incorporation of specific incentives into the contract bidding process to promote the use of clean fuel or low-emission construction equipment;
- Require the use of Diesel Particulate Traps, where feasible and appropriate;
- Require restrictions on truck and construction equipment idling;
- Encourage the restriction of operations to alternative fuel vehicles, where feasible and appropriate

In the case of soil disturbance-related measures, the use of soil stabilizers and water or dust suppressants is stipulated in MM 3.4-3a and 3.4-3g. Street sweeping of dirt tracked out onto adjoining roads is stipulated in MM 3.4-3e. The paving of construction roads and shoulders is stipulated in MM 3.4-3d. Restrictions on trucks hauling dirt are stipulated in MM 3.4-3c. The suggestions to appoint a construction relations officer to act as community liaison, and to conduct air quality monitoring at nearby sensitive receptors are both more appropriately considered at the project level.

The Final PEIR includes a Mitigation Monitoring and Reporting Program (MMRP) designed to ensure that adopted, generally feasible mitigation measures are implemented, monitored, and documented.

8. All references to the "South Coast SIP" are amended to the "2003 SCAQMP/SIP"
9. Anticipated participation in project-level CEQA review is noted.

Letter E-04-0020

**Transportation Corridor Agencies
Macie Cleary-Milan
Comment received February 9, 2004**

1. The PEIR is not intended to provide detail for project-specific analyses. The PEIR acknowledges that individual project EIRs will be conducted for the transportation projects. As stated in the Introduction (PEIR page 1-1), "The PEIR offers useful regional-scale analysis and mitigation for subsequent, site-specific environmental reviews conducted by implementing agencies as individual projects in the RTP are developed."
2. The RTP PEIR Mitigation Monitoring and Reporting Program (MMRP) requires each lead agency to submit a mitigation compliance report for transportation projects subject to an EIR or a Mitigated Negative Declaration. This report must include the lead agency's decision as to whether or not a mitigation measure is appropriate.
3. SCAG has an oversight role for regionally significant developments and reviews regionally significant development through its Intergovernmental Review program to ensure consistency with the RTP and the Regional Comprehensive Plan and Guide. The PEIR, through its Mitigation Monitoring and Reporting Program, indicates mitigation measures where SCAG has authority and indicates where SCAG has oversight of mitigation measures carried out by project implementation agencies.
4. CEQA requires that the EIR discuss feasible measures to avoid or substantially reduce the project's significant environmental effect for each significant impact identified in the EIR (Guidelines 15126.4(a)). The mitigation measures in the Land Use section are considered generally feasible and are anticipated to reduce impacts. SCAG recognizes that many of these measures will be enforced by the implementation agencies and not by SCAG. However, should an implementing agency fail to implement appropriate and feasible mitigation, then the Mitigation Monitoring and Reporting Program will help ensure implementation. See response 6 below regarding consistency with currently adopted general plans.

Some of the mitigation measures involve building consensus on land use policy. Through SCAG's Compass Growth Visioning program and through the Regional Council, SCAG will conduct policy discussions and will work to build consensus for the future land uses of the region. SCAG acknowledges that it has limited authority to enforce these urban-form policies.

5. The RTP PEIR provides a first-tier, regional evaluation of impacts on land use, which considers cumulative impacts that influence the pattern of urbanization. The RTP PEIR is a regional planning document and is not intended to provide information in detail sufficient for project-specific analyses. Many of the projects identified in the Draft 2004 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components. It is acknowledged that the regionally significant impacts may or may not be significant impacts at the subregional, local, or project level. Subsequent project-level environmental evaluations will determine whether or not there are significant, project-level impacts to land use.
6. SCAG used existing general plans in the SCAG database to develop the RTP. The PEIR explains the limitations of these general plans, stating that they may be out of date and may not reflect current planning policy or practice. The PEIR identifies inconsistencies with general plans as a significant impact in Impact 3.1-3 and offers four mitigation measures to reduce the impact. Nonetheless, the PEIR concludes that even with mitigation, some currently adopted general plans will need to be updated.

CEQA requires that impacts be compared to existing conditions, and, while the RTP does not directly cause many of the impacts identified in the PEIR, implementation of the RTP is

expected to help facilitate, accommodate, and, in some areas, induce growth. In addition, the PEIR analyzes the relationship between the Plan Alternative and what would happen without the Plan, the No Project Alternative (in the Comparison with the No Project Alternative). The analysis presented in Table 3.1-2: Land Uses Affected by Major Highway, Transit, and Freight Rail Projects in the 2004 RTP allows decision makers to see the impacts in 2030 of the Plan versus no Plan.

7. The RTP PEIR provides a first-tier, regional evaluation of population, jobs, and housing and considers growth facilitated by the Plan. Under the Plan, the regional population is forecast to grow by 6.3 million people and the regional employment is projected to grow by 3 million jobs between 2000 and 2030, as shown in Table 3.2-13 (see revised version in Section 5 below). Without the Plan, the regional population is forecast to grow by 6.3 million people and 2.7 million jobs. The RTP is expected to alter the distribution and density of population and is expected to alter the growth rate in certain parts of the region. Overall, the regional population growth rate is expected to remain the same, regardless of whether or not the projects in the RTP are built. The transportation projects proposed in the RTP are expected to lead to more jobs and households in the region compared to not building these transportation projects. The RTP accommodates expected growth but also facilitates growth in certain parts of the region due to land use and transportation strategies.
8. It is acknowledged that the regionally significant impacts, including significant impacts to vacant natural land, may or may not be significant impacts when viewed at the individual project level. Subsequent project level EIRs will determine whether or not there are significant impacts to land use.
9. SCAG is the designated Metropolitan Planning Organization for Southern California, but has no project implementing authority within the region. However, should an implementing agency fail to implement applicable recommended mitigation measures, then SCAG will send correspondence that identifies that the project is not consistent with regional environmental mitigation policies.
10. The past two RTPs both have separate discussions of HOV lanes and toll projects. The 2004 RTP format is consistent with these past RTPs. However, the referenced bullet point lists High Occupancy Toll Lanes as one of the feasible mitigation measures, and SCAG takes this to include congestion pricing schemes in general.
11. Please see the response to comment #5 in letter #0012.
12. The Draft PEIR states that the PEIR evaluates the potential regional-scale environmental impacts associated with implementing the RTP, as a whole, and that site-specific environmental evaluations, including long-term effects, will be conducted by implementing agencies as individual projects are implemented.
13. Figure 3.1-2 Open Space and Recreation Lands is modified to show the dedicated open space in Orange County.

Letter E-04-0021

**County of Orange
Timothy Neely
Comment received February 9, 2004**

1. No Comment from the County of Orange noted.



Letter E-04-0022

**City of La Habra
Nelson Wong
Comment received February 9, 2004**

1. Orange County Transportation Authority (OCTA) is responsible for issuing a finding of compliance with OCTA's Congestion Management Program (CMP) for the local jurisdictions in Orange County. OCTA's 2003 CMP is consistent with the 2001 Regional Transportation Plan (RTP) and with the 2002 Regional Transportation Improvement Program (RTIP). The 2001 RTP and the 2002 RTIP are the current federally approved and conforming plan and program for project implementation.
2. OCTA, through its County Transportation Improvement Program (TIP), incorporates the Capital Improvement Program (CIP) projects into the SCAG RTIP and the RTP. SCAG's RTIP implements the early years of the respective RTP. Projects and programs in the front years of the 2004 RTP are based on the 2002 RTIP.
3. SCAG considered existing general plans in the SCAG database to develop the RTP, but, in creating the RTP land use assumptions, SCAG departed from local general plans to a limited degree. It cannot be assumed that local general plans are consistent with RTP land use assumptions beyond 2010. SCAG cannot and will not require cities to amend their general plan. SCAG is committed to working with local governments beyond the adoption of the RTP to identify opportunities for planning and development that achieve a mutual benefit.

Letter E-04-0023

**City of Lake Forest
Robert Woodings
Comment received February 9, 2004**

1. The California Scenic Highway Mapping System lists a portion of Route 91 in Orange County as the only officially designated State Scenic Highway. Portions of Routes 1, 57, 74, and 91 are eligible for State Scenic Highway designation but have not been designated to date. El Toro Road is not included in the state database of officially designed State Scenic Highways.
2. Aliso Creek was included in the Draft PEIR's analysis of impacts to impaired water bodies. Aliso Creek does not appear in Table 3.12-13 because this table lists impaired water bodies that have been identified to occur within 150 feet of a freeway, transit, or freight rail project included in the 2004 RTP.



Letter E-04-0025

Coalition for a Safe Environment

Jesse Marquez

Comment received February 9, 2004

1. The 2004 PEIR fulfills all of the applicable requirements of CEQA and provides a useful and objective first-tier, environmental evaluation of the 2004 RTP. The PEIR identifies 54 significant impacts, including numerous cumulative and growth-inducing impacts, evaluates a reasonable range of alternatives, and provides over 170 generally feasible mitigation measures.

The commentor does not specify how the PEIR fails to comply with the indicated laws. SCAG believes that the PEIR fully complies with all applicable Federal, State, and local regulations. The PEIR provides baseline setting data at the appropriate level of detail for this programmatic document and for the level of detail to which the plan is specified.

2. The RTP includes Transportation Control Measures (TCMs), which are expected to have substantial benefits in reducing VMT and associated mobile source emissions. TCMs receive funding priority, and a TCM substitution process is available in the event that an applicable transportation program or project needs to be substituted subsequent to the adoption of the RTP/Regional Transportation Improvement Plan.
3. The PEIR identifies *potentially* significant environmental impacts and generally feasible mitigation. The scale and scope of the RTP PEIR analysis requires that SCAG consider many complex issues for which a clear cause and effect relationship has not been fully established scientifically. The significance criteria for the RTP PEIR have been designed to incorporate this uncertainty. Specifically, the significance criteria for the PEIR generally employ the conservative standard of *potentially* significant, and mitigation measures are proposed to minimize these effects.
4. Comment noted. The RTP public comment period was extended to approximately 110 days. The RTP PEIR public comment period met the legal requirements and was extended one week (beyond the required 45 days) to help foster additional public participation.
5. SCAG undertook extensive outreach efforts as part of the integrated RTP EIR process. SCAG's public outreach program for the 2004 RTP directly reached approximately 5,000 residents of the SCAG region, plus many more via newspaper and electronic media (for example, there were about 200 news articles about the RTP). The outreach effort involved more than 200 events, including custom presentations, public workshops and meetings, and media broadcasts -- more events than were conducted for the 2001 RTP despite a reduced budget. Though SCAG is limited by time and financial resources, and challenged by the vast size of the region, SCAG recognizes that public outreach and participation can always be enhanced. SCAG appreciates the constructive suggestions for increasing outreach and participation and will make every effort to improve with each RTP cycle. However, the multi-million dollar cost of even one mailing to all residents in the SCAG region would be beyond SCAG's financial resources. Similarly, SCAG does not have the resources to appear in every local jurisdiction in the region. SCAG has no jurisdiction over the Port of Los Angeles and cannot require their staff to take any action.
6. Each project in the Regional Transportation Plan must go through a project-specific review and approval process conducted by the agency implementing the project. Some of the projects in the plan have begun this process, while others are conceptual and have not yet begun. The public will have a full opportunity to participate in the review and approval process for each of the individual projects in the RTP. For information on how the public was informed of the RTP, please refer to response #5 above.



7. Detailed cost analyses are provided in the Technical Appendices of the draft 2004 RTP (Appendix B and Appendix I). Further, in the performance measures section (Appendix C), a detailed benefit/cost analysis for the RTP is provided. In addition, specific projects in the Plan should include project-level economic and community analysis as projects in the Plan are implemented.
8. The RTP includes Transportation Control Measures (TCMs), which are expected to have substantial benefits in reducing VMT and reducing associated energy consumption and mobile source emissions. Specifically, the RTP includes three classes of TCM projects:
 - i. High-occupancy vehicle (HOV) measures, or their pricing alternatives (toll roads, congestion pricing);
 - ii. Transit and system management measures (all forms of public transit, inter-modal facilities connecting different forms of transit, non-motorized transportation facilities); and
 - iii. Information technology-based transportation strategies (programs that promote the use of mass-transit and ride-sharing, education and outreach, use of the internet or other means to match ride-sharing partners, Smart Corridor System Management, Intelligent Transportation Systems, computerization of traffic flow management, telecommuting arrangements).

More information on these can be found in the 2003 SCAQMP/SIP, or in the 2004 RTP Conformity Report, Technical Appendix E.

9. Comment noted.
10. Comment noted. The RTP and the PEIR are draft documents that will be considered for approval/certification by the SCAG Regional Council in the spring of 2004. For compliance with State and Federal requirements, see the response to comment #1 above.
11. The methodology section for each resource category in the PEIR describes that multiple methods were employed to evaluate impacts identified in the PEIR. For instance, a 150-foot potential impact zone and a one-quarter mile impact zone were drawn around the freeway, freight rail, and transit projects in the 2004 RTP to evaluate different types of impacts. These impact zones were overlaid onto SCAG's year 2000 aerial photography data to compute the number of acres of various types of land uses that could potentially be affected by projects in the 2004 RTP. The same methodology was used to overlay the impact zones onto maps of certain biological resources, water resources, and geologic and other types of hazards maps to compute the number of acres of these resources and hazards that potentially could be affected by projects in the 2004 RTP. Other impacts, such as impacts to air quality, transportation, and population, were appropriately evaluated at the regional scale.
12. Figure 3.1-1 shows the existing land use patterns (including residential) in conjunction with rail, transit and highway projects. Additionally, Figure 3.4-2 shows the location of sensitive receptors in conjunction with rail, transit and highway projects. Project-specific noise data would be more appropriately evaluated at the project level.
13. The PEIR describes potential health impacts associated with air quality pollutants. For instance, Impact 3.4-1a identifies a significant impact from PM₁₀, and the Draft PEIR includes discussion of associated health factors such as "increases in asthma attacks," "premature deaths," "cardiovascular disease," and other "acute and chronic health effects," in addition to cancer (PEIR page 3.4-10 and Table 3.4-1).

A preliminary health risk assessment was conducted for the PEIR. This assessment is available at SCAG's offices. Please see response #5 in comment letter E-04-0019.

In addition, the RTP is required and expected to successfully demonstrate conformity with the National Ambient Air Quality Standards (NAAQS) for all pollutants for which State and

Federal health criteria (the so-called "criteria pollutants") have been established. These standards take account of the potential adverse health impacts of air pollution.

- 14-27. Under Impact 3.4-3, Short-term (Construction) Regional Impacts, the PEIR discusses the implications of construction activity resulting from implementation of the RTP, and stipulates that the impacts from these activities are expected to exceed the significance thresholds established for the region by the SCAQMD's CEQA Air Quality Handbook <<http://www.aqmd.gov/ceqa/hdbk.html>>. The PEIR incorporates SCAQMD's Rule 403 (Fugitive Dust) by reference (page 3.4-35). The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) activity by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

In addition, the PEIR already takes into account a number of the specific mitigation measures suggested in the letter (11.1-11.14), under MM 3.4-3 (page 3.4-35 and 3.4-36), such as:

- Use of low sulfur or other reformulated fuel (MM 3.4-3i)
- Discontinue all excavation and grading activities during Stage II Smog Alerts and under high wind conditions (MM 3.4-3b)
- Utilize electric power, to the extent possible, for construction equipment (MM 3.4-3k)
- Apply water or dust suppressants to exposed earth surfaces (MM 3.4-3a)
- Apply water or non-toxic soil stabilizers to all unpaved areas where construction equipment is being operated (MM 3.4-3g)
- Reduce on-site traffic speeds on all unpaved construction surfaces (MM 3.4-3h)

MM 3.4-3h is revised to state "Traffic speeds on all unpaved construction surfaces shall not exceed 25 15 miles per hour".

The following mitigation measures are added to the list on page 3.4-35:

MM 3.4-3q: Incentivize ride sharing and mass transit among construction workers to the extent possible.

MM 3.4-3r: Water any exposed surfaces at least twice daily to maintain surface crust, where appropriate.

- 28-32. SCAG has no jurisdictional authority over the marine ports, but is working with other local, state, and federal agencies to encourage reform of on-site operations at the Port of Long Beach/Los Angeles, and to find mitigation for the full range of transportation activities associated with their operation. Specifically, SCAG supports the use of reformulated diesel fuel (low-sulfur, biodiesel), supports the extension of the hours-of-operation at the Ports, and encourages the use of ridesharing and mass transit by port employees.

33. The California Environmental Quality Act (CEQA) does not require environmental justice to be addressed within an Environmental Impact Report. SCAG has addressed environmental justice related to the impacts of the 2004 Regional Transportation Plan within the Plan itself, in Chapter 5 (Plan Performance) and in Technical Appendix G. Our public outreach effort included outreach to environmental justice, low-income and minority groups, and many key planning documents were translated into Spanish.

34. Impact 3.4-2: Long Term (Operational) Localized Impacts (page 3.4-33) specifically and unequivocally states that the adverse health impacts from increases in transportation activity are expected to be significant. The PEIR finds that the cancer risk resulting from operation of freeway sections would be likely to exceed the acceptable threshold of one in one million at locations close to some freeways. Please see response # 5 to comment E-04-0019. Additional information on adverse health effects from mobile source emissions and numerous mitigation measures are provided in the Air Quality Section of the PEIR.

35. Comment noted. As a programmatic analysis of the 2004 RTP, the PEIR does not, and is not required to, provide impact analysis for specific facilities. The impacts to wetlands are discussed at the regional scale in Impact 3.7-6. Other regional impacts to biological resources are discussed in Impacts 3.7-1 through 3.7-9. Further discussion of project-level impacts will be appropriately disclosed as those projects are planned, designed, and implemented.
36. Comment noted. As a programmatic analysis of the 2004 RTP, the PEIR does not, and is not required to, provide impact analysis for specific facilities. The impacts to water quality are discussed at the regional scale in Impacts 3.12-1, 3.12-2, 3.12-4, and 3.12-5. Further discussion of project-level impacts will be appropriately disclosed as those projects are planned, designed, and implemented.
37. Please see the responses to comments 35 and 36, above.
38. The RTP PEIR provides a first-tier, regional evaluation of aesthetics and views, which considers impacts to coastal views from construction and operation of projects included in the RTP. The PEIR identifies impacts 3.6-1 through 3.6-4 and cumulative impact 3.6-5 that may have significant impacts on aesthetics and views in the region. The PEIR identifies mitigation measures for each of these impacts.

The Draft 2004 RTP PEIR is a regional planning document and is not intended to provide information in detail sufficient for project-specific analyses. Many of the projects identified in the Draft 2004 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components. Environmental evaluations conducted for individual projects may establish a community-level aesthetic plan.
39. The RTP PEIR provides a first-tier, regional evaluation of public utilities and services, which considers impacts on emergency services from construction and operation of projects included in the RTP. The PEIR identifies a regionally significant cumulative impact to emergency services in cumulative impact 3.13-6 and identifies a mitigation measure for this impact. Environmental evaluations conducted for individual projects may establish a Public Emergency and Disaster Response Plan.
40. Mitigation measures are directed at mitigating impacts to the maximum extent feasible wherever they occur.
41. Measures to mitigate impacts to biological resources are provided in Mitigation Measures 3.7-1a through 3.7-9a. The 2004 RTP (including adopted mitigation measures) is required to be a financially constrained plan. An annual \$50 million nature preservation and restoration trust fund is financially infeasible and would interfere with SCAG's ability to make the required air quality conformity finding that the Plan is financially constrained for all fiscal years.
42. Such a study or plan would be outside the agency's mandate and scope as a designated Metropolitan Planning Organization. However, three sources of information regarding tsunamis in the particular context of Southern California are:
 - The National Tsunami Hazard Mitigation Program's Center for Tsunami Inundation Mapping Efforts, at <http://www.pmel.noaa.gov/tsunami/time/ca/index.shtml>;
 - The University of Southern California Tsunami Research Group, at <http://www.usc.edu/dept/tsunamis>; and
 - The Earthquake Engineering Research Institute's report: Evaluation of Tsunami Risk to Southern California Coastal Cities, at http://www.eeri.org/tsunami_risk/FinalRept.pdf.
43. Such a study or plan would be outside the agency's mandate and scope as a designated Metropolitan Planning Organization. However, there are a number of collaborative efforts

currently underway, such as the Southern California Aerial Mapping Project undertaken by the US Geological Survey and the California Geological Survey at <http://scamp.wr.usgs.gov/scamp/index.html>; the Southern California Earthquake Data Center at <http://www.data.scec.org/>; and the California Integrated Seismic Network at <http://www.cisn.org/>, which, together, seek to better capture and depict seismic activity and associated risks from a multi-agency perspective.

44. An analysis of the degree to which traffic in the region contributes to global climatic change is beyond the scope of this document.
45. A Mitigation Monitoring and Reporting Program is required by CEQA. SCAG has prepared this document (see Section 6 below). It contains mitigation measures for all significant impacts identified in the PEIR, including impacts to air, water, and land.
- 46, 47. The RTP is a fiscally constrained plan. There is no funding source for a public health care trust fund or a public environmental care trust fund.
48. A public community health survey is outside of SCAG's mandate and scope as a designated MPO.
49. A diesel truck alternative fuel/oxidation catalyst/particulate trap plan is beyond the scope of the RTP, which pertains to transportation infrastructure. However, in response to comments 15 and 30 above, SCAG will encourage the use of reformulated diesel.
50. A ship bunker fuel alternative fuel and oxidation catalyst/particulate trap/stack bag technology plan is beyond the scope of the RTP, which pertains to transportation infrastructure.
51. SCAG's proposed mitigation measures include a recommendation to include solar energy panels in future transit station design. SCAG does not have any regulatory authority to require the adoption of solar energy technology or funding to help pay for equipment conversion. SCAG has received a small grant from the California Energy Commission that will be used to promote building energy efficiency among our local government members, including the use of solar energy.
52. The RTP and PEIR include a regional evaluation of traffic and goods movement. The PEIR identifies regional-scale environmental and community impacts from projects in the RTP, and the RTP and PEIR include mitigation to reduce impacts from goods movement and traffic. In addition, SCAG and the subregions have conducted various goods movement truck and rail studies, which consider environmental effects. Project level evaluations and mitigation will be conducted by implementing agencies as projects in the RTP are implemented.
53. Traffic routing, parking, and city code education are most appropriately evaluated and mitigated at the local level by implementing agencies as projects are planned, designed, and constructed.
54. SCAG has no jurisdiction over container storage yards permit verification.
55. The RTP PEIR provides a first-tier, regional evaluation of public utilities and services, which considers impacts to emergency services from construction and operation of projects included in the RTP. The PEIR identifies in Impact 3.13-1 that the direct impact to emergency services due to construction of projects would be less than significant. The PEIR identifies a regionally significant cumulative impact to emergency services in Cumulative Impact 3.13-6 and identifies a mitigation measure for this impact. Environmental evaluations conducted for individual projects may establish a plan for the hiring of additional emergency personnel.

- 56, 57, 58, 59. These mitigation measures are more appropriate at the individual project level. Some projects may require these measures and others will not.
60. A regional greening plan is currently outside of SCAG's mandate and scope as a designated MPO.
61. Measures to mitigate regional-scale impacts to water quality, stormwater runoff, and groundwater infiltration are provided in Mitigation Measures 3.7-6a through 3.7-6d, 3.7-7a through 3.7-7b, 3.12-1a through 3.12-2c, and 3.12-4a through 3.12-5a. The type of stormwater and water discharge measures recommended in the letter are within the scope of these program-level mitigation measures included in the Draft PEIR. Further discussion of project-level impacts and the appropriate mitigation of those impacts will be appropriately disclosed as those projects are planned, designed, and implemented.
62. Mitigation Measures MM3.5-1a through MM3.5-2j describe ways that implementing agencies can lessen noise impacts during the construction and operation of projects. The level of analysis in the RTP PEIR was appropriate for a first-tier analysis; site specific noise analysis and mitigation will be necessary at the project level.
63. The RTP PEIR provides a first-tier, regional evaluation of aesthetics and views, which considers light impacts from construction and operation of projects included in the RTP. The PEIR identifies Impacts 3.6-1 through 3.6-4 and Cumulative Impact 3.6-5 on aesthetics and views in the region. The PEIR identifies mitigation measures for each of these impacts. Environmental evaluations conducted for individual projects may establish a Community Light Pollution and Public Health Study.
64. SCAG has no jurisdiction to regulate emissions from ships or to regulate the energy sources they use. Ships are under the jurisdiction of the federal government (or in some cases, foreign governments). SCAG has requested that the federal agencies either impose stricter controls on these sources, or delegate authority to the local air districts to do so.
65. Please see the response to comment #7.
66. Economic impacts are not impacts on the physical environment and, thus, are not required to be identified by CEQA.
67. The RTP PEIR provides a first-tier, regional evaluation of public utilities and services, which considers impacts on public services from construction and operations of projects included in the RTP. The Draft 2004 RTP PEIR identifies regionally significant cumulative impacts to emergency services, school facilities, and solid waste services and mitigation measures for these impacts. Environmental evaluations conducted for individual projects may establish a Public Emergency and Disaster Response Plan.
68. A public mortality study is outside of SCAG's mandate and scope as a designated MPO.
69. A public health survey is outside of SCAG's mandate and scope as a designated MPO.
70. A public morbidity survey is outside of SCAG's mandate and scope as a designated MPO.
71. Epidemiological studies are outside of SCAG's mandate and scope as a designated MPO.
72. The RTP is a fiscally constrained plan, and funds for public school air purification systems were not programmed in the RTP. However, individual projects should consider this mitigation.

73. The RTP is a fiscally constrained plan, and funds for public youth sports complexes or athletic buildings air purification systems were not programmed into the RTP. However, individual projects should consider this mitigation.
74. Measures to mitigate regional-scale impacts to water resources are provided in Mitigation Measures 3.7-6a through 3.7-6d, 3.7-7a through 3.7-7b, 3.12-1a through 3.12-2c, and 3.12-4a through 3.12-5a. The 2004 RTP (including adopted mitigation measures) is required to be a financially constrained plan. An annual \$25 million waterway restoration trust fund was not programmed into the RTP and would be financially infeasible because the Plan is required to be financially constrained for all fiscal years.
75. The PEIR identifies a regionally significant cumulative impact to solid waste services in Cumulative Impact 3.13-9 and presents three mitigation measures to reduce the impact. Environmental evaluations conducted for individual projects may establish a Community Blight Study.
76. Community-level studies, including community seismic and vibration studies, are most appropriately conducted at the project level as projects in the Plan are implemented. Please also see the response to comment #43 above.
77. The RTP PEIR is a regional, programmatic planning document and it includes a comprehensive evaluation of cumulative impacts in each resource section of Chapter 3 and in Chapter 5. Individual projects will be required to include a site-specific cumulative impact assessment.
78. SCAG staff is exploring the creation of a regional environmental justice advisory group.
79. The PEIR complies with the CEQA definition of mitigation.
80. Comment noted.
81. Comment noted. Please see response to comment #3 above.
82. All documents requested are available for review at the SCAG offices or are available at public libraries.
83. The Response to Comments is part of the Final PEIR.

Letter E-04-0026

County of Ventura

Carl Morehouse

Comment received February 9, 2004

1. MM 3.4-3h is revised to state "Traffic speeds on all unpaved construction surfaces shall not exceed ~~25~~ 15 miles per hour."
2. Tables 3.4-13 and 3.4-14 reflect draft emission budgets provided to SCAG by CA Air Resources Board on November 7, 2003. Table 3.4-16 is based on the 2003 SCAQMP/SIP. The Tables are amended to reflect the source documents (see Section 5 below).



Letter E-04-0027

Tom Politeo

Comment received February 9, 2004

1. An analysis of the degree to which traffic in the region contributes to global climatic change is beyond the scope of this document.
2. Since the future of fuel prices is so uncertain, reasonable forecasts may differ substantially in their conclusions. For this analysis, SCAG chose to rely on the U.S. government's forecast as published by the Energy Information Administration. The fuel price forecast is reconsidered every three years when the Regional Transportation Plan is updated.
- 3, 4. The PEIR analyzes two alternatives, called PILUT 1 and PILUT 2, that integrate land use and transportation planning to a large extent, with the goal of reducing impacts, including air emissions.
5. The California Environmental Quality Act (CEQA) does not require environmental justice to be addressed within an Environmental Impact Report. SCAG has addressed environmental justice related to the impacts of the 2004 Regional Transportation Plan within the Plan itself, in Chapter 5 (Plan Performance) and in Technical Appendix G. SCAG's public outreach effort included outreach to environmental justice, low-income and minority groups, and many key planning documents were translated into Spanish. SCAG appreciates suggestions on how to improve the public outreach and participation process.
6. The recommendations for analyzing the relationship between financing methods and transit demand are noted.
7. Truck emissions are considered as part of the overall regional air quality analysis. The regional-scale aesthetic impacts of the 2004 RTP are considered in Section 3.6 "Aesthetics and Views." Transportation safety issues are addressed in Section 3.3 "Transportation," and hazardous materials safety issues are discussed in Section 3.10 "Hazardous Materials." The safety analyses are programmatic, analyzing the sum of effects of the 2004 RTP, including truck traffic. This regional and programmatic discussion of impacts is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts will be appropriately disclosed as those projects (transportation system management, new investments, or other projects) are planned, designed, and implemented.
8. The impacts to water quality due to pollutants from roads and other projects included in the 2004 RTP are discussed in Impact 3.12-1. Cumulative effects of urbanization on water quality are addressed in Impact 3.12-4. Mitigation measures are proposed, however the impacts remain significant after mitigation.
9. Planning is a consensus building process that can only be achieved and implemented with the cooperation of all of the diverse parties involved.



Letter E-04-0028

California Department of Transportation, Districts 7, 8, 11, 12

Rose Casey

Comment received February 9, 2004

1. The 2004 RTP considers transit as a viable option for enhancing and improving access to the region's airports. The Plan includes several transit strategies that address the increased demand for public transportation access to the region's airports. These improvements include both light rail and transitway projects such as the extension of the Green Line to LAX and the implementation of the Crenshaw Corridor transitway. The preferred aviation plan assumes high speed rail linkages between airports and major activity centers including Union Station. Aviation related high speed rail ridership is assumed to be approximately 15% of all high speed rail ridership.
2. Comment noted. SCAG's Regional Council will consider adopting a Statement of Overriding Considerations when it certifies the PEIR.
3. Comment noted.
4. The air quality analysis in the PEIR identifies aviation-related impacts as significant (pages 3.4-41 – 3.4-44) based on an explicit significance threshold presented in the Draft PEIR. The Draft PEIR was circulated to the FAA, CARB, and the air management districts.
5. Airport operation-related noise is an important factor in ensuring land use compatibility. Each county containing an airport that is served by a scheduled airline, or that is operated for public benefit, is required to establish an Airport Land Use Commission (California Public Utilities Code Section 21670); this Commission is the designated forum for resolving any conflicts in use that may arise, either out of changes in operation at the airport, or due to proposed changes in land use. However, as the designated Metropolitan Planning Organization for the region, SCAG has always taken an active role in helping to shape a systems approach to aviation planning within the region. A key part of this effort is the Airport Technical Advisory Committee (ATAC), comprised of the managers of all commercial and public airports, which has served effectively as a forum for standardizing aviation planning practices across the region.
6. SCAG's Regional Council will consider adopting a Statement of Overriding Considerations when it certifies the PEIR.
7. Toxic Air Contaminants (TACs) have been considered, specifically on page 3.4-28. Volatile organic TAC emissions are captured by the analysis of reactive organic gases, while the particulate portion of diesel exhaust, which has been identified as a TAC by California EPA, is considered as part of the analysis of PM10. Greenhouse gas (GHG) emissions are outside the regional scope of this PEIR.
8. As described above, TACs are considered to be sufficiently captured by SCAG's emission analysis of ROG and PM. Diesel particulate matter is discussed on PEIR page 3.4-30. Mobile sources of ROG are expected to decrease in the future, in part due to control measures proposed by SCAG and by the air districts, and in part due to changes in engine and fuel specification as well as other controls proposed by CARB and the Federal agencies. In the case of particulate matter (PM10 and PM2.5), emissions are also expected to decrease compared to the No Project Alternative, although they are expected to generally increase in the region, compared to current conditions. The diesel portion of PM10 can be expected to generally decrease due to changes in engine and fuel specification proposed by the State and Federal agencies, as is shown by the heavy-duty truck component of the Emissions analysis in PEIR Appendix 7.3. However, it should be noted that some components of PM



(such as reentrained dust) are directly related to the vehicle miles traveled (VMT), and thus are expected to increase with increases in VMT.



Letter E-04-0029

Los Angeles World Airports
Jim Ritchie

Comment received February 9, 2004

- 1, 2, 3. The 2004 PEIR fulfills all of the applicable requirements of CEQA and provides a comprehensive first-tier environmental evaluation of the 2004 RTP. Specifically, the PEIR identifies 54 significant impacts, including numerous cumulative and growth-inducing impacts, evaluates a reasonable range of alternatives, and provides over 170 generally feasible mitigation measures. The assumptions upon which the environmental evaluations were based are reasonable, especially considering the time frame and the complexity and uncertainty of implementing a regional plan through 2030. Specific assumptions for the PEIR are provided in the methodology section for each resource category and assumptions about the RTP are included in the RTP Technical Appendix.
4. Flat percentages were not used to model ridership demand for each Maglev segment connecting to LAX. Percentages were generated by high speed rail ridership models based upon market characteristics, passenger ground access choice behavior and forecast aviation demand.
5. About 19% of total air passengers are forecast to access airports using the high-speed Maglev system, and 12-15% of total air cargo, depending on train frequencies and available cargo capacity on the Maglev system. Like air passenger capacity, available air cargo capacities at suburban airports will need to be utilized to avoid urban airport expansion. High-value and time-sensitive express and mail cargo is carried on HSR trains on a regular basis in Germany and Japan. Similar types of cargo are expected to be transported by Maglev to and from suburban airports and intermodal distribution centers in Southern California, to take advantage of the speed and predictability of airport access that will be afforded by the Maglev system. The advantages of Maglev access to airports for time-sensitive cargo is forecast to increase with increasing highway congestion on the regional highway network.
6. Maglev technology has the capacity to transport both cargo and people, similar to steel rail. However, Maglev will be concentrating on high-priced, time-sensitive cargo, which is currently transported to and from airports and intermodal distribution centers. It is anticipated that special express trains would transport the cargo, running at frequencies of less than six per hour, and primarily operating during off-peak passenger periods. Trains will be equipped to efficiently load and handle cargo, using push/pull loading and unloading techniques into rear cars.
7. The Aviation Plan in the 2004 RTP is based on an airline "brokering" concept that is designed to remove barriers to airlines providing a wider range of flight offerings at airports in the region, primarily Palmdale, Ontario and March Inland Port airports. SCAG agrees that in its current stage it is broadly defined. SCAG is committed to work with LAWA and other airport operators, as well as the airlines, to provide further substance and detail as to how this strategy will be implemented over the coming years. Similar to the Plan Alternative demographic forecast, it is anticipated that substantial implementation of the strategy will not occur until after 2010. Before 2010 a continuous implementation process will be established, including initiation of discussions between implementing entities. The Plan forecasts that about 27% of regional aviation demand will be international, compared to about 20% currently. This reflects a more rapid growth rate in international traffic than domestic travel, recognizing the position of Southern California as a prime gateway to the Pacific Rim, as well as expanding ties to Pacific Rim countries, particularly China. Even with LAX forecast at 50% international air traffic in 2030, the forecasts of 14.1% and 17.3% international air traffic at Palmdale and Ontario airports, respectively, are necessary to prevent the loss to other regions of future international service and its substantial economic benefits. It should be

noted that the international forecasts are not assumptions, but are based on the “airline brokering” concept in conjunction with the replication of air passenger behavior in the RADAM model, including expressed air passenger preferences for international airport alternatives as indicated in the RADAM air passenger surveys. It should also be noted that RADAM uses a definition for international passengers that may be different than what LAWA uses, since it includes commuter flights that primarily carry international connecting passengers.

8. Passengers that would use Palmdale in the 2030 Preferred Aviation Plan would originate primarily from the Antelope, Santa Clarita, and San Fernando Valleys. Figures showing the primary origins of passengers for each airport in the Preferred Aviation Plan are included in the Final 2004 RTP. The primary international destinations of passengers using Palmdale Airport in the Preferred Aviation Plan would be Canada, Mexico, Central America and South America.
9. LAWA’s and SCAG’s capacity estimates for Ontario Airport are very similar and within the range of varying possible assumptions about future aircraft types, load factors, and acceptable delays. It should be noted that since the SCAG forecast assumes a greater percentage of international service at Ontario airport in 2030 than LAWA, SCAG also expects a greater percentage of large and very large aircraft servicing the airport, including the 600-seat A-380 aircraft.
10. The service area for LAX will continue to be the entire region and beyond. This is because LAX will continue as the primary international gateway for the region, providing high-frequency long haul and international service to multiple destinations that will not be matched by other airports in the region.
11. The California HSR system is not included as a construction project in the RTP, and, thus, was not evaluated.
12. Comment noted.

Letter E-04-0030

City of Laguna Niguel

Stephen Higa

Comment received February 9, 2004

1. The comment regarding the City's support of the conclusion that there will be inconsistencies between land use strategies in the 2004 RTP and currently adopted general plans is noted. The Statement of Overriding Considerations and applicable findings will be mailed to the City.
2. SCAG does not have the authority to overturn local land use authority. SCAG is a consensus-building organization and will encourage dialogue among its member jurisdictions about the future shape of the region. One way SCAG is doing this is through the Compass Growth Visioning program. The forthcoming Regional Growth Vision will be used to build a consensus in the region to support changes in land use to accommodate future population growth while maintaining the quality of life in the region.
3. The Land Use Scenario Maps used in the Compass Growth Visioning project are not part of the RTP or the PEIR. SCAG has solicited feedback on these maps for use with the Compass program and will incorporate the City of Laguna Niguel's comments on the final version of the Compass map. The RTP includes Compass Growth Visioning-developed land use strategies on a regional and subregional level. The PEIR analyzes the RTP's environmental effects on land use on a regional, programmatic level. Neither the RTP nor the PEIR analyzes land use changes on the city level.
4. The RTP does not contain forecasted growth for individual cities. The process for determining regional housing need will proceed independent of and subsequent to the RTP. The forecasted growth in the RTP is considered by the California Department of Housing and Community Development in developing the region's total share of statewide housing need (California Government Code Section 65584).

Letter E-04-0031

**Coachella Valley Water District
Dan Farris
Comment received February 4, 2004**

1. No comment from Coachella Valley Water District noted.

Letter E-04-0032

Robert Chang

Comment received February 9, 2004

1. Completion of environmental review, including an EIR, is not a criterion for inclusion in the RTP.

By 2030 the Maglev system is expected to move up to 500,000 riders a day, which would be expected to reduce vehicle miles traveled (VMT) and associated emissions. Please see page 104 of the Draft RTP for more details.

2. The regional-scale environmental impacts of the Maglev system are discussed in each resource section of the Draft PEIR.

SCAG uses a travel demand model to analyze future traffic impacts. The traffic generated by the Maglev system is captured by the model and included in the analysis of Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT) in delay for all vehicles and heavy-duty trucks. This information is presented in Section 3.3 of the PEIR and in the 2004 RTP.

3. There are many mitigation measures that will lessen the impact of noise from the Maglev system. The most preferable measures are those that will not impact the performance of the system. Since the alignment for a portion of the system would follow the freeway alignment, mitigation measures for reducing freeway noise may also apply to the Maglev system. The least preferable mitigation measures for Maglev are MM 3.5-2h and MM3.5-2i, which reduce the speed of the Maglev and eliminate the sensitive receptors by acquiring right of way.
4. The RTP PEIR provides a first-tier, regional evaluation of aesthetics and views, which considers impacts to viewsheds of projects in the RTP, including the Maglev system. Impact 3.6-1 identifies a significant impact to views by construction and implementation of individual projects in the RTP. The PEIR identifies Mitigation Measures 3.6-1a and 3.6-1b to mitigate the impacts to views. However, the PEIR acknowledges that there will remain a significant impact to views caused by construction and implementation of projects in the RTP, including the Maglev system.
5. SCAG's ongoing research and analyses indicate that the Maglev component of the RTP would be financially feasible as a user-fee backed project. SCAG continues to monitor and assess the institutional framework for facilitating the development of projects involving extensive private sector participation.

In response to this request, Maglev has been added to the "areas of known controversy."

6. Since the proposed Maglev system is planned to be implemented subsequent to the year 2010, no emission reduction credits are being sought for its use, and it cannot be considered a part of the "black box" measures. The RTP is required to demonstrate conformity with the current State Implementation Plan (SIP), and is required also to show attainment of the National Ambient Air Quality Standards (NAAQS) for ozone by the year 2010. It should also be noted that SCAG evaluated RTP PEIR Alternatives (PILUT 1 and No Project) that did not include Maglev.
7. As stated in the Draft PEIR, the Program Environmental Impact Report is a first-tier document, and project-specific CEQA documents, including project-level EIRs, will be prepared for specific projects in the RTP.
8. A discussion of physical and environmental capacity constraints at existing air carrier airports can be found in the RTP aviation technical appendices. The extent to which federal regulations are pertinent to these constraints is also discussed.

9. The comments regarding the land use/transportation connection are noted. SCAG used existing general plans in the SCAG database to develop the RTP. The PEIR explains the limitations of these general plans, stating that they may be out of date and may not reflect current planning policy or practice. The PEIR identifies inconsistencies with general plans as a significant impact in Impact 3.1-3 and offers four mitigation measures to reduce the impact. Nonetheless, the PEIR concludes that even with mitigation, some currently adopted general plans will need to be updated. SCAG will work through its four mitigation measures to build support for land use/transportation measures in member cities and counties and will work to help member cities and counties implement land use changes.
10. Comment noted.



Letter E-04-0033

City of Los Angeles

Ed Reyes

Comment received February 9, 2004

1. The 2004 RTP does not preclude use of traffic calming as a mitigation measure. In general, SCAG considers this to be more of a local issue that is best addressed at a local level. For measures relating to reducing disturbances to neighborhoods and community facilities and to maintaining pedestrian access, please see Mitigation Measures 3.2-2a through 3.2-2c and 3.2-3a and 3.2-3b.



**Letter E-04-0035 California Department of Housing and Community Development
Linda Wheaton
Comment received February 9, 2004**

1. The RTP PEIR provides a first-tier, regional evaluation of impacts on land use and population, housing, and employment, which considers impacts to general plans and housing. The PEIR analyzes the physical impacts to land use in 2030, compared with the most current data. In the case of land use, the data is from SCAG's year 2000 aerial photography. The PEIR does not analyze land use in intermediary years between 2000 and 2030.

The PEIR explains the limitations of general plans, stating that they may be out of date and may not reflect current planning policy or practice. The PEIR identifies inconsistencies with general plans as a significant impact in Impact 3.1-3 and offers four mitigation measures to reduce the impact. Nonetheless, the PEIR concludes that even with mitigation, some currently adopted general plans will need to be updated.

The PEIR explains the current housing situation in the environmental setting of Section 3.2, Population, Housing, and Employment. The PEIR identifies building permits issued, owner and rental vacancy rates, homeownership rates, affordability, and average persons per household. The PEIR also identifies the forecast households for the Plan. The PEIR analyzes the physical impacts to housing in 2030, compared with these current data. The PEIR does not measure intermediate years nor does it speculate where there is a greater amount of housing needed compared to existing plans or the local input into the RTP.

Letter E-04-0036

**Orangeline Development Authority
Albert Perdon
Comment received February 9, 2004**

1. The RTP includes the Orangeline from LAUPT to Anaheim. A feasibility study from Anaheim to Irvine has yet to be completed. This segment will be considered for inclusion in future RTP updates upon completion of the feasibility study.
2. SCAG supports the continued planning of multiple Maglev segments.
3. Comment noted.

Letter E-04-0038

City of Los Angeles, Environmental Affairs Department
Gretchen Hardison
Comment received February 6, 2004

1. The PEIR analyzed an alternative (PILUT 1 Alternative) without Maglev, as discussed in Chapter 4 of the PEIR.
2. The Governor's State Budget proposal may have an impact on transportation funding and conformity for the SCAG Region. Information available to date, however, is preliminary. As more finalized information becomes available, the RTP may be amended if necessary.
3. Evaluation of the PILUT alternatives analyzed substantial infill development around transit centers, including a first-tier consideration of Maglev stations and other transit improvements in the 2004 RTP.

SCAG has also completed several studies on different segments of the Maglev system. They are available at the SCAG website, <http://www.scag.ca.gov/maglev/>. These studies provide detailed analysis of each segment of the proposed Maglev system for Southern California.

The Compass Growth Visioning program provided land use strategies input into the development of the RTP. These strategies address transit-oriented development for existing and future transit stations (see RTP Chapter 4: Thinking Out of the Box: Land Use-Transportation Connection) and the strategies are considered in the calculations for total vacant land that will be consumed (see PEIR Cumulative Impact 3.1-4). The PEIR is a regional planning document and is not intended to provide information in detail sufficient for project-specific analyses of development around individual transit stops.

4. The comment regarding a need for additional mitigation measures to protect farmland and grazing land is noted. The following mitigation measures are added:

MM 3.1-1g: SCAG shall encourage implementation agencies to establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands.

MM 3.1-1h: SCAG shall encourage implementation agencies to avoid the premature conversion of farmlands by promoting infill development and the continuation of agricultural uses until urban development is imminent; if development of agricultural lands is necessary, growth should be directed to those lands on which the continued viability of agricultural production has been compromised by surrounding urban development or the loss of local markets.

MM 3.1-1i: SCAG shall encourage implementation agencies to obtain assistance from the American Farmland Trust in developing and implementing farmland conservation measures.

5. The comment regarding the need for additional mitigation measures to protect open space is noted. The following mitigation measures are added:

MM 3.1-2g: SCAG shall encourage member jurisdictions to work as partners to address regional outdoor recreation needs and to acquire the necessary funding for the implementation of their plans and programs.

MM 3.1-2h: SCAG shall encourage member jurisdictions that have trails and trail segments determined to be regionally significant to work together to support regional trail



networks. SCAG shall encourage joint use of utility, transportation and other rights-of-way, greenbelts, and biodiversity areas.

MM 3.1-2i: To provide more opportunities for access to open space close to the urban core, SCAG shall encourage that multiple use of spaces be allowed as feasible and practical and encourage redevelopment activities to focus some investment on recreation uses.

6. The comment that SCAG should act as a clearinghouse for local governments is noted. SCAG provides many services to its members, including: socioeconomic data, Geographic Information Systems (GIS) mapping, aerial photography, transportation and air quality modeling, and technical assistance in areas such as housing policy, land use policy, economic development policy, and legislative policy. SCAG supports its member subregions each year by funding a wide variety of subregion-sponsored transportation-related projects. SCAG's Intergovernmental Review of EIRs promotes the consideration of SCAG policies.
7. The apparent discrepancy arises from the distinction between direct and cumulative impacts. Table 3.1-2 presents the potential direct impacts of RTP freeway, transit, and freight rail projects on land uses that are within a 150-foot buffer of the projects. The acres potentially affected by the Plan are much higher than the No Project because the Plan contains many more transportation projects than the No Project. In contrast, the quoted text, which states that the No Project and the Plan are expected to "consume similar acres of vacant land," refers to the expected cumulative impacts (PEIR p. 3.1-17) because both the No Project and the Plan are expected to considerably contribute to the regional cumulative consumption of 500,000-700,000 acres of vacant land. The confusion likely arises, as least in part, from the location of Table 3.1-2, which was intended to be presented on page 3.1-18 in the "Comparison with the No Project Alternative" section. For clarification, Table 3.1-2 has been moved to the Direct Impacts section in the Comparison with the No Project Alternative. The urban-form strategies in the RTP and the mitigation measures included in the Land Use section of the PEIR are intended to reduce development on natural, vacant land.
8. The Plan transportation projects and growth vision are expected to be successful in keeping per capita delay relatively constant, from 7.9 minutes per day in 2000 to 8.0 minutes per day in 2030. Despite this result, total delay increases from 2000 to 2030 due to an increase in population. Accessibility is expected to increase because the expected pattern of urbanization in 2030 under the Plan is envisioned to result in people living closer to places of work.
9. Major sources of PM10 are presented in Table 3.4-1 (p. 3.4-7) and described on p. 3.4-9. Implementation of Mitigation Measures 3.4-1a, 3.4-1b, and additional measures will help reduce the impact.
10. Background information on PM2.5 is included in Table 3.4-1 (p. 3.4-7) and described on pages 3.4-9 and 3.4-10.
11. The statement that mobile sources are responsible for approximately half of the total lifetime cancer risk attributed to air toxics is from the United States Environmental Protection Agency. Control of emissions of Hazardous Air Pollutants from Mobile Sources. *Federal Register*, 66:17234-17237, March 29, 2001.

In addition to the numerous air quality mitigation measures for the RTP PEIR, air quality mitigation has been incorporated into the 2004 RTP in the form of Transportation Control Measures (TCMs) designed to reduce transportation emissions and urban form strategies to help reduce VMT and associated emissions. In addition, Impact 3.4-1b identifies a beneficial impact to Toxic Air Contaminants (TAC) under the 2004 RTP.



12. Under the Plan in 2030 the percentage of single-passenger trips is expected to decline, but the total number of single-passenger trips is expected to increase due to the projected growth in population, households, and employment. The PEIR discusses increases in single-passenger highway travel in sections 3.3 and 3.4. The RTP includes measures (Transportation Control Measures) to help reduce VMT and associated emissions. In addition, the Draft PEIR proposes Mitigation Measure 3.3-1a recommending further actions to reduce all-vehicle and heavy-duty truck travel and delay, including reductions in trips made by single-occupant vehicles. These measures include additional car-sharing programs, additional vanpools, additional bicycle programs, and implementation of a universal employee transit pass program. However, measures that would necessitate additional funding, beyond those programs already included in the RTP, are currently institutionally and financially infeasible because the RTP is required to be a financially constrained plan. Though SCAG is unable to commit additional funds, it is committed to encouraging measures that decrease travel delay.

The comment is noted that VMT is directly related to growth.

13. As stated above (#11), the PEIR includes numerous mitigation measures to reduce the adverse air quality impacts, and the RTP includes projects and policies designed to lower impacts, including health risk levels.
14. The PEIR includes MM 3.4-3c: All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).
15. The apparent contradiction between statements can be explained by the distinction between long-term operation impacts (p. 3.4-26) and short-term construction impacts (p. 3.4-34). Emissions from mobile sources are expected to decrease under the Plan, and, thus, long-term operational impacts are expected to be beneficial (except for PM10). In contrast, short-term construction impacts are expected to be significant.
16. The PEIR considered Alternatives (PILUT 1 and No Project) that assume the Constrained Aviation Plan. Details on the emissions are presented in Table 3.4-19 and additional information about PILUT 1 is included in Chapter 4 of the PEIR.
17. The total natural waterway miles within the Los Angeles River watershed are 801 miles.

For clarity, the title of the table is corrected as follows:

Table 3.7-2: Characteristics of Major Coastal Watersheds

The source for the table is corrected as follows:

Information Center for the Environment. (2001). www.ice.ucdavis.edu/newcara/. Accessed May 2003.

18. Page 3.7-14, Paragraph 1 is changed as follows:

Coastal Marine Resources

The coastal waters of Southern California are extremely rich in fisheries and other marine resources. Not only is the ecosystem diverse, with 144 families and over 500 species of fishes reported, but it is also very productive. Fish families prominent in the SCAG coastal waters include 23 species of viviparous surfperches (Embiotocidae), ~~more than 60 species of sea basses (Sebastes)~~ various rockfishes (Scorpaenidae), about 60 species of sculpin (Cottidae), over 20 species of flounder (Pleuronectidae), five species

of salmon (Salmonidae), ~~and various rockfishes (Scorpaenidae)~~ and other small bottom fishes (Stichaeidae, Blenniidae, Clinidae).

19. The following mitigation measures are added:

MM 3.10-1c and 3.10-3d: SCAG shall encourage federal, state, and local efforts to educate businesses on the use of less dangerous alternatives to hazardous materials.

20. At the regional level, the additional 6,700 lane miles associated with freeway, arterial, and HOV projects and the additional impervious surfaces associated with transit, Maglev, goods movement enhancement and study corridors would have a regionally significant impact on water quality. As the conclusion for Impact 3.12-1 states, the impact would remain significant after mitigation.

The statement on pages 3.12-23 through 3.12-24 is changed as follows, consistent with the conclusion on page 3.12-27. This change does not alter the impact analysis, but is included for clarity:

The inclusion of runoff control measures in the design of future roadway projects will ~~improve water quality and eliminate~~ reduce further impairments of the local receiving waters.

This regional and programmatic discussion of impacts is appropriate for a regional, first-tier PEIR. Further discussion of project-level impacts, including localized TMDLs, will be appropriately disclosed as those projects (transportation system management, new investments, or other projects) are planned, designed, and implemented.

21. As a programmatic document, the PEIR identifies the 2004 RTP's cumulatively considerable contribution to the water quality impacts of urbanization. To predict the impact on impaired water body listings and wasteload and TMDL implications would be speculative and not appropriate for a regional-scale document. Further discussion of project-level impacts will be appropriately disclosed as those projects (transportation system management, new investments, or other projects) are planned, designed, and implemented.

Letter E-04-0039

**City of Anaheim
Linda Johnson
Comment received February 9, 2004**

1. The PEIR is a first-tier, regional-scale evaluation. Implementing agencies are responsible for notifying affected cities and counties as specific projects in the Plan are planned, designed, and constructed.
2. Comment noted.
3. Significant impacts from railroads were included in the evaluation for cumulative noise impact 3.5-4. Noise impact analyses will be conducted for specific projects prior to implementation, unless a project is exempt. Please also see response to comment letter E-04-0019 #3 for additional discussion of federal sources, such as railroads.
4. The comment that transportation projects along the State Scenic Highways-designated portion of SR 91 in the City of Anaheim would have to be reviewed by the City of Anaheim is noted. The PEIR identifies a significant regional impact to State Scenic Highways in impact 3.6-2 and offers three mitigation measures to reduce this impact. Lead Agencies that conduct environmental evaluations for individual projects will work with the City of Anaheim to meet the City's goals, policies, and regulations, as related to State Scenic Highways and the City's Scenic Corridor Overlay Zone.
5. Please see response to comment letter # 0002 comment #2.
6. SCAG prepared data sets for all five RTP PEIR alternatives on the Transportation Analysis Zone (TAZ) level. SCAG modeled these data and analyzed the results. Analysis of the Plan Alternative appears in Section 3 of the PEIR. Analysis of the remaining four alternatives, including the Modified 2001 RTP Alternative, is available in Section 4 of the PEIR.

The CEHD and Regional Council will adopt socioeconomic data (population, households, and employment) at the subregional and regional level. The PEIR presents socioeconomic data, by subregion and region, for the No Project and Plan Alternatives. For comparison purposes, socioeconomic data for the Modified 2001 RTP Alternative by subregion are presented in the table below.

The growth distribution within Orange County used for modeling purposes in the Final RTP is consistent with the Orange County Projection, based on consultation with the Orange County Council of Governments, Orange County Transportation Authority, and the Center for Demographic Research at California State University-Fullerton.

Modified 2001 RTP Alternative Population, Households, and Employment in 2030 (in thousands)			
Subregion	Population	Households	Employment
Arroyo Verdugo Cities	399	151	274
City of Los Angeles	4,425	1,668	2,260
Coachella Valley Council of Governments	716	257	266
Gateway Cities Council of Governments	2,392	682	1,011
Imperial Valley Association of Governments	270	84	111
Las Virgenes Malibu Council of Governments	135	47	58
North Los Angeles County	1,241	370	285
Orange County Council of Governments	3,553	1,152	1,989
San Bernardino Associated Governments	2,479	740	950
San Gabriel Valley Council of Governments	2,713	898	1,179
South Bay Cities Council of Governments	1,000	345	525
Ventura County	993	335	467
Western Riverside Council of Governments	2,330	809	856
Westside Cities	245	123	305
SCAG Region	22,890	7,660	10,536
Source: Southern California Association of Governments. (2003, October). <i>Draft 2004 regional transportation plan</i> . Los Angeles, CA: Author.			

7. The comment regarding the city boundaries of Anaheim, Stanton, and Cypress is noted. The PEIR incorporates these edits in Figure 3.1-3 City Boundaries.
8. The comment regarding labeling SR 55 and SR 241 is noted. The PEIR incorporates these edits in Figure 3.3-2 Existing (2000) Highway System.
9. The comment regarding mitigation measures for electrical infrastructure and improvements is noted. The PEIR adds Mitigation Measure 3.13-2b and 3.13-8b: "The implementation agency shall work with the local jurisdiction(s) where the project is being built to ensure compliance with public utility codes and regulations."
10. Measures to positively affect water quality through management of urban runoff are acknowledged in the paragraph labeled "Water Reclamation and Recycling" on page 3.12-11 of the Draft PEIR and in Mitigation Measures 3.12-3a through 3.12-3e.
11. Please refer to the paragraphs titled "The U.S. Environmental Protection Agency (EPA)" on page 3.12-16 for discussion of the National Pollutant Discharge Elimination System permits and requirements for municipalities.

Letter E-04-0040

City of Rancho Palos Verdes

Joel Rojas

Comment received February 9, 2004

1. Table 3.7-6 is modified to reflect that the Palos Verdes Peninsula Subregional Plan Planning Area is 7,872 acres.



Letter E-04-0042

City of Montebello
Tonya Pace
Comment received February 9, 2004

1. The RTP PEIR provides a first-tier, regional evaluation of population, housing, and employment, which considers the displacement of homes and businesses from construction and operation of projects included in the RTP. In the PEIR analysis, a 150-foot potential impact zone was drawn around the freeway, freight rail, and transit projects in the 2004 RTP. This zone was overlaid onto SCAG's year 2000 aerial photography data to compute the number of acres of housing and business land uses that could potentially be affected by projects in the 2004 RTP. Many of the projects identified in the Draft 2004 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components. Implementation agencies are required to notify the City and residents if specific transportation projects, including freight rail expansion, will require acquisition of rights-of-way that may displace residents and businesses.
2. Table 4.12 of the Draft 2004 RTP states that the total proposed regional investment in the RTP for grade crossing improvements is \$2 billion.

The RTP PEIR provides a first-tier, regional evaluation of impacts from construction and operation of projects included in the RTP. For each significant impact identified in the PEIR, SCAG has developed mitigation measures to reduce the impact. Many of the projects identified in the Draft 2004 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components.

Mitigation Measure 3.2-3b requires implementation agencies to design roadway improvements that minimize barriers to pedestrians and bicyclists, as feasible, and SCAG will help enforce this mitigation measure through its Mitigation, Monitoring, and Reporting Program and its Intergovernmental Review program.

3. The RTP PEIR identifies four significant noise impacts and includes numerous mitigation measures to help reduce these impacts. The comment is noted that noise impacts from the expansion of freight rail should be mitigated by constructing noise barriers, per Mitigation Measure 3.5-2d.

Letter E-04-0043

**City of Fullerton
Heather Sowers
Comment received February 9, 2004**

1. The comment regarding the Fullerton City Hall is noted. The Fullerton City Hall is added to Table 7.6: Sites in the SCAG Region Listed on the National Register of Historic Places.



**RESPONSES TO COMMENTS ON THE RTP PEIR RECEIVED AFTER THE
CLOSE OF THE PUBLIC COMMENT PERIOD**



Letter E-04-0041

**Department of Pesticide Regulation
Cheryl Langley
Comment received February 11, 2004**

1. No Comment from the Department of Pesticide Regulation is noted.

Letter E-04-0044

University of California, Los Angeles
Donald C. Shoup
Comment received February 20, 2004

1. The following mitigation measure is included in the RTP PEIR to address the request in this late comment:

MM 3.3-1b: SCAG shall encourage education about and implementation of California's Parking Cash Out law as a means of further reducing VMT.

